

Privacy Impact Assessment

Maplesoft Maple T.A Placement Suite

PIA#16-003 (Office of the University Secretary to assign)

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 University Secretary to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FOIPPA generally, please contact Heather Sanford (University Secretary) at heather.sanford@unbc.ca or (250) 960-5878 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 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:	College of Science of Management		
PIA Drafter:	Erin Beveridge		
Email:	Erin.Beveridge@unbc.ca	Phone:	250-960-6263
Program Manager:	Erik Jensen - Dean of CSAM		
Email:	Erik.jensen@unbc.ca	Phone:	250-960-5755

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

1. Description of the Initiative

Math Placement Assessment Pilot – This initiative will help determine whether math placement assessments will be useful in determining where to place students based on a pre-assessment using Maple T.A. Placement Suite.

2. Scope of this PIA

Up to 125 students will take the math placement testing through Maple TA placement suite in the Spring/Summer and Fall 2016 semesters.

3. Related Privacy Impact Assessments

N/A

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4. All Elements of Information or Data

Information included in the initiative is first and last name, student number, placement test score, grade in the course taken and email. The information provided to Maple will be anonymous codes that correspond to students taking the assessment tests. Maple will produce the placement scores for UNBC. All other information will be circulated internally.

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.

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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

All information going to Maple will be anonymized and a coding guide will be available to SLI-CSAM and a project coordinator which will be hired before the first assessment. Instructors from the course will be provided with the student score from the assessment. Only the actual score associated with the anonymized identifier will be on the Maple server. On Maple’s servers, that score will not be associated with an identifiable student.

6. 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>	
<p>1. Personal information from one database is linked or combined with personal information from another database;</p>	No
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	No
<p>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.</p>	No
<p>If you have answered "yes" to all three questions, please contact the University Secretary to discuss the requirements of a data-linking initiative.</p>	N/A

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7. Common or Integrated Program or Activity*

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.

1. This initiative involves a program or activity that provides a service (or services);	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;	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

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>CSAM-SLI purchases 125 seats from Maplesoft and creates 125 unique anonymous identifiers with non-sequential passwords to provide to allow students to anonymously participate in the placement assessment.</i>	<i>Disclosure</i>	<i>30</i>
2.	<i>When students come to take the test, they will be given an identifier and they will log into the Maple servers with that identifier and password.</i>	<i>Disclosure & Use</i>	<i>30</i>
3.	<i>When students have completed taking the assessment, the coordinator will download the scores from the Maple server onto UNBC servers.</i>	<i>Collection</i>	<i>26(e)</i>
4.	<i>Connects the scores associated with the identifier provided at the assessment with the student name assigned to the</i>	<i>Collection & Use</i>	<i>26(e) and 33.2(a)</i>

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	<i>identifier, student number, grading information and course.</i>		
5.	<i>Coordinator will analyze the data to determine if the scores are predictive whether each student will fail the MATH 152 or MATH 115 course that student has registered for.</i>	Use	33.2(a)
6.	<i>Coordinator will generate a report of the validity of the placement suite based on predictions whether students will likely fail to complete MATH 152 or MATH 115 courses by analyzing the placement scores.</i>	Use	33.2(a)
7.	<i>Information regarding the student's associated placement score is kept as is for one year. After one year, the student's results are anonymized again to protect their privacy while allowing their results to be used to allow the Chair of Math to track performance trends.</i>	Disposition	31 and 35(1)(a)

9. Risk Mitigation Table

Examples can be removed and additional lines added as needed.

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

10. Collection Notice

The following Consent Notice will be posted on a Blackboard shell that students must read before participating in this pilot program:

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University of Northern British Columbia

CSAM: Department of Math

Consent for Participating in Placement Assessments Using the Maple T.A. Placement Suite

I hereby consent to the University of Northern British Columbia Department of Math and the College of Science and Management using my personal information pertaining to my participation in the Maple T.A Placement Suite pilot project. The personal information that will be used includes placement scores received from Maplesoft associated with my anonymized identifier I will receive before completing the placement assessment. I understand my placement score will be combined on UNBC servers with other identifying information including my name, student number, email, and the final grade I receive in the Math course I'm taking at UNBC. I understand the compiled information will be used to measure the validity of using placement assessments at UNBC including determining the accuracy of the Maple T.A. assessments in predicting my success in a UNBC Math course.

The University of Northern British Columbia collects personal information under section 26(e) of the Freedom of Information and Protection of Privacy Act for the purposes of evaluating methods to improve student experiences in the Department of Math. In this pilot project, the University of Northern British Columbia provides Maplesoft with anonymized usernames and passwords to protect your privacy regarding your performance in the placement exam.

The end date for the authorization to hold my personal information will be _____ [end date of placement exam + 1 year written as YYYY-MM-DD]. After this point, I understand that all personal identifiers will be removed from my test score and the test scores will continue to be stored for tracking purposes by the Department of Math.

If I identify, or am concerned about, any inaccuracy of my personal information, I will report any errors or concerns to Erin Beveridge at erin.beveridge@unbc.ca or 250 960 6263.

By continuing to participate, I agree to this consent notice. If I do not agree with the consent notice at any point in participating in this pilot project, I will inform Erin Beveridge I do not consent and I will cease participating.

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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 the UNBC University Secretary, the Chief Information Officer or the IT Security Officer when filling out this section.

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?

SLI-CSAM or Project Coordinator will be able to make changes if information needs to be updated or corrected.

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

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No. The pilot project will not use the placements scores to advise the students on academic decisions. Placements scores are only being used to measure the validity of placement assessments.

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?

The personally identifiable data will be retained for a year after which it will be anonymized and used as tracking data by the Department of Math.

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 University Secretary.

N/A

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

No

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the University Secretary, 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 FOIPPA. Under this same section, this information is required to be published in a public directory.

No

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

Part 6 – University Secretary Comments

This PIA is based on a review of the material provided to the University Secretary as of the date below. If, in future any substantive changes are made to the scope of this initiative, the project sponsor is required to complete a PIA update and submit for approval.

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Part 7 – Program Area Signatures

ERIN BEVERIDGE _____ [Redacted] _____ April 12, 2016
Name of Individual leading the Program/Project _____
(Normally the individual who completed the PIA) _____
Date

Eric Jensen _____ [Redacted] _____ April 12 2016
Program/Department Manager or Project Sponsor _____
Date

N/A _____ N/A _____ April 12 2016
Contact Responsible for Systems Maintenance and/or Security _____
(if applicable) _____ Signature _____ Date

HEATHER SANFORD _____ [Redacted] _____ April 12-16
Head of Public Body, or designate _____
(at UNBC, this is the University Secretary) _____ Signature _____ Date

Please send a copy of this PIA with the respective signatures to Heather Sanford, University Secretary for comment, review, approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Access, Privacy & Records Office.