UNBC UNIVERSITY OF NORTHERN BRITISH COLUMBIA

Privacy Impact Assessment
McGraw Hill Connect

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

PIA#*17-008* *(Office of the University Secretariat to assign)*

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:	Centre for Teaching, Learning and Technology
PIA Drafter:	Clarence Hofsink
Email:	Clarence.hofsink@unbc.ca **Phone:** 2509606679
Department Manager:	**Heather Smith**
Email:	Heather.Smith@unbc.ca **Phone:** 2509606655

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

1. **Description of the Initiative**

McGraw-Hill Connect provides a service that allows instructors to conduct online assessments and assignments that integrates with Blackboard. Instructors can use this supplementary online instruction tool to create additional assignments for grading that can be pushed back to UNBC Blackboard.

2. **Scope of this PIA**

The intent is to allow all instructors to use McGraw-Hill Connect content as needed to supplement their existing instruction.

3. **Related Privacy Impact Assessments**

N/A

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4. All Elements of Information or Data

Student and instructor's first name, last name, association with UNBC, email address, grading information, alias information, course information,

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**

   McGraw-Hill Connect will be storing and accessing information from their servers in Reston, Virginia.

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;	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 Table

Personal Information Flow Table			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	*Student purchases the textbook which provides a code to give the student access to Mc-Graw Hill connect through Blackboard*	*N/A*	--
2.	*From Blackboard the student begins to register for the Mc-Graw Hill connect account using the code provided in the textbook.*	*Collection*	*26(c)*

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|			
3.	During registration, through an automated process, UNBC creates an unique identifier key that does not contain the personal information about the student.	Protection	30.1
4.	During registration, the student may use an alias that protects their personal information from being transferred to Mc-Graw Hill Connect servers. This alias will be associated with their unique identifier key instead of their Blackboard information	Protection	30.1
5.	Students begin to access McGraw-Hill content in order to complete supplementary assignments as directed by the instructor	Use	32(a)
6.	Students complete assignments and submit them to the McGraw-Hill Connect Service.	Collection	26(c)
7.	After providing a grade for the assignments, McGraw-Hill connect pushes the grade back to the unique identifier linked to Blackboard	Disclosure	33.1(e)
8.	The unique identifier key pushes the data to the correct student's gradebook account.	Protection	30.1
9.	The instructor can view the grade in the student's Blackboard gradebook	Disclosure	33.1(e)
10.	If the instructor needs to, the instructor may use the unique identifier key to track the grade back to Mc-Graw Hill Connect servers to see the raw results of the assignment or assessment.	Disclosure	33.1(e)

9. **Risk Mitigation Table**

	Risk	Mitigation Strategy	Likelihood	Impact
	Risk Mitigation Table			
1.	███████████████████████	███████████████████████	████████	██████

![UNBC Logo] **UNBC** UNIVERSITY OF
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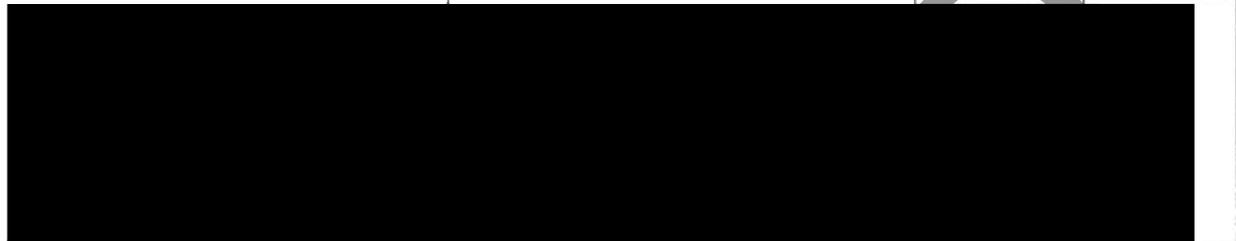
2.	███████████████████████████
3.	███████████████████████████

10. Collection Notice

N/A -- > Students will be provided with the opportunity to alias themselves during the registration process with McGraw-Hill Connect. A splash screen will remind students that their data is being transmitted to a server that is outside of Canada and will explain how the security features will protect them. An example is below:

The University of Northern British Columbia recommends that you use an alias when registering with McGraw Hill Connect to prevent your performance data within this service from being directly associated with you while being transmitted to Virginia in the United States of America. Using an alias will not impact your ability to receive grades because McGraw Hill Connect does not directly send grading information to your Blackboard account. An identifier key masks your personal information when data is transferred between UNBC and McGraw-Hill Connect.

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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 <u>physical</u> security measures related to the initiative (if applicable).

12. Please describe the <u>technical</u> security measures related to the initiative (if applicable).

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

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.

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

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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?**

    Instructor will have to reset the assignment in cases when the student loses connection during an assignment or assessment. It will be the student's responsibility to inform the instructor that they require an assignment or assessment to be reset to attempt again.

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

    Yes, the performance data generated in McGraw-Hill Connect will be used to assign a grade to the student for their assignment or assessment.

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.**

    See question 16.

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?**

    UNBC will ask McGraw Hill to delete information from the McGraw Hill Connect service one year after the course is complete.

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

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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 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, the public body will have to complete a PIA update and submit for approval.

Instructors will need to be prepared to conduct all of the information management practices before using this service. Instructors will be responsible for ensuring that data pertaining to their course is deleted one year after the course is completed. Any information required for longer than one year will be migrated back to and stored on UNBC servers.

The Centre for Teaching, Learning, and Technology will be responsible for ensuring that instructors learn all of the skills required to properly manage their course on McGraw Hill Connect.

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Part 7 – Program Area Signatures

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

Date   Aug 28/17

Heather Smith
Director or Dean Overseeing the
Program/Project

Signature   Date   Aug 28/17

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

Signature   Date   Aug 28/17

Adam Cullum
Information Governance Officer
(Privacy Officer)

Date   Aug 28/17

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.
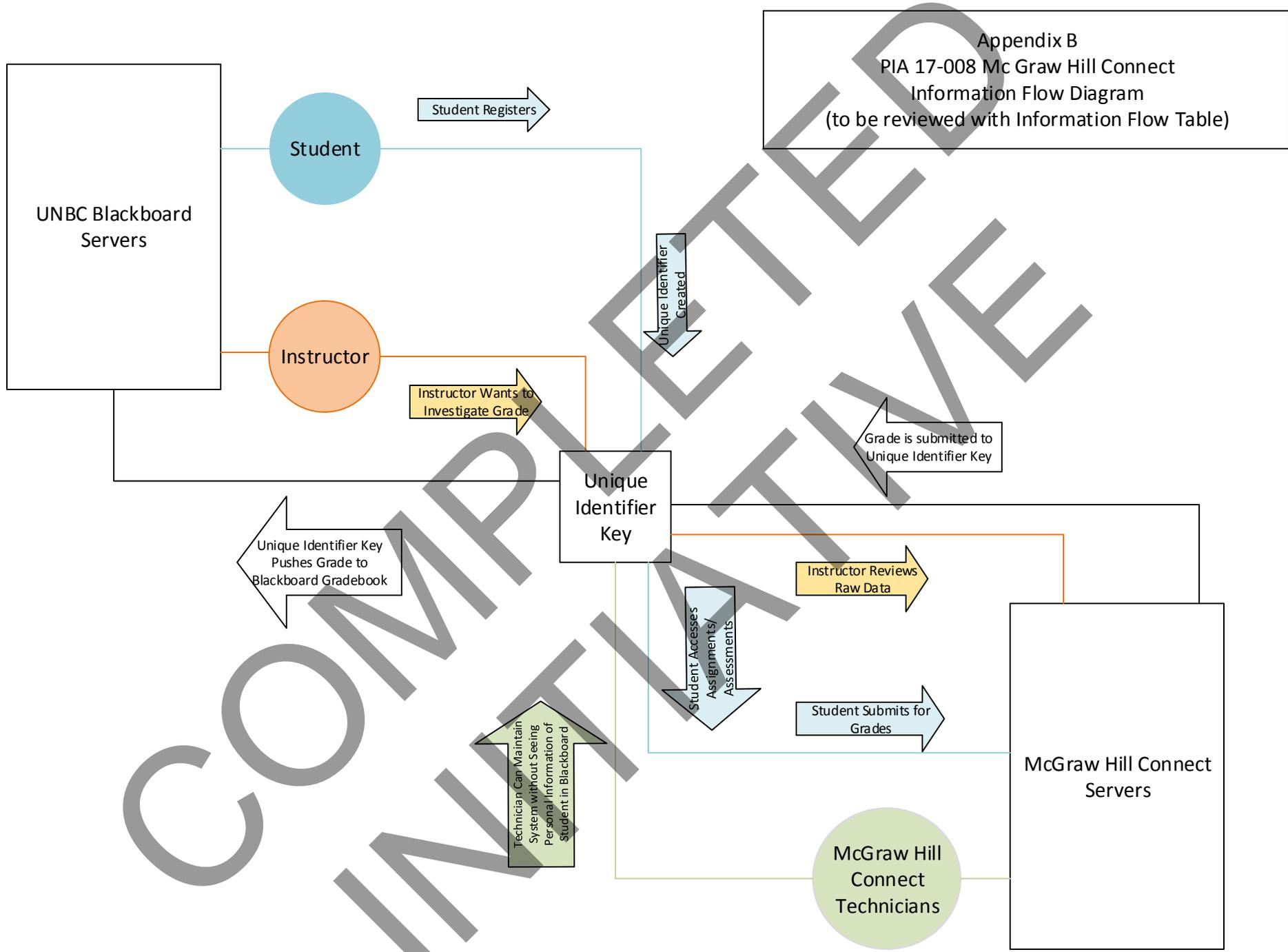
Appendix B
PIA 17-008 Mc Graw Hill Connect
Information Flow Diagram
(to be reviewed with Information Flow Table)

UNBC Blackboard Servers

Student

Student Registers

Instructor

Unique Identifier Created

Instructor Wants to Investigate Grade

Grade is submitted to Unique Identifier Key

Unique Identifier Key

Unique Identifier Key Pushes Grade to Blackboard Gradebook

Instructor Reviews Raw Data

Student Accesses Assignments/ Assessments

Technician Can Maintain System without Seeing Personal Information of Student in Blackboard

Student Submits for Grades

McGraw Hill Connect Servers

McGraw Hill Connect Technicians