

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (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:	Centre for Teaching, Learning and Technology		
PIA Drafter:	Clarence Hofsink		
Email:	clarence.hofsink@unbc.ca	Phone:	250 960 6679
Department Manager:	Anne Sommerfeld		
Email:	anne.sommerfeld@unbc.ca	Phone:	250 960 5319

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

1. Description of the Initiative

Pearson MyLabs and Mastering (MLM) is a series of homework, tutorial and assessment systems used by students and instructors to engage students and increase retention. Instructors download a course from the online catalogue that contains Pearson-owned and created content. Instructors can use and adjust the Pearson-created online content to match their course outcomes and create assessments. The gradebook allows professors to view individual or class-wide trends. Students are able to access eText, videos, simulations, self-quizzes and other resources. Installing and enabling the plug in allows students and professors to access Pearson MyLab resources via the secure LTI (Learning Tools Interoperability) standard.

2. Scope of this PIA

Instructors opting to use Pearson MyLabs and Mastering products and students that consent to registering to use the system.

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

3. Related Privacy Impact Assessments

Similar to other textbook resource PIAs including PIA 17-008 Mc-Graw Hill Connect.

4. All Elements of Information or Data

Pearson account: student name (or pseudonym created by the student), student's preferred email address, username and password, grading information, open field inputs, student assessment responses and selections.

Blackboard account: student name, UNBC email address and login credentials, LMS identifier (to authenticate connection to Pearson, grading 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.

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

Pearson services are hosted in Colorado and Massachusetts. Students cannot be required to use these systems to complete courses required to graduate from their programs. For required courses in a program of study, the instructors will need to develop an alternative means for students to complete assignments worth grades or to receive information that will directly impact assessment of their performance.

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 ¹
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

¹ The personal information itself isn't linked but a token authenticating personal information within Blackboard is connected to Pearson in the use of this service as proposed.

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

7. Common or Integrated Program or Activity*

<p>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.</p>	
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.	Student signs into Blackboard and connects to the Pearson materials through the Blackboard shell associated with their UNBC course. The first connection to the Pearson materials will connect students externally to the Pearson site to generate a Pearson account profile. The information during the account registration is the information that will be	Collection	26(d)

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

	provided to Pearson's servers. Account registration includes username/password, first name/last name, and email address. Students are shown a "show user acknowledgment message" which will allow them to be informed that they are sending information outside of Canada.		
2.	The Pearson system and Blackboard share a tokenized identifier per student to match the accounts in order to prevent more detailed personal information transferring from Blackboard to Pearson. Since Pearson is only pulling information from the anonymized token, the student has the option to alias all of the registration information to protect their privacy.	Protection	30
3.	As assignments are completed on the Pearson MyLabs and Mastery service, the token identifier submits the performance data back to the corresponding Blackboard user's Grade Centre based on Grade Update Frequency selected. Students consent within Blackboard to this process.	Disclosure & Use	33.1(1)(b) and 32(b)
4.	The instructor extracts the performance data from the Grade Centre and generates an official grade for the student at the end of the semester.	Use	32(b)
5.	Student requests their performance data is removed from Pearson servers after the course is completed.	Disposition	31

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, 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]		

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

2.	
3.	

10. Collection Notice

Informed Consent Notice (shown in the show user acknowledgment message field)

As part of taking this course, you will be asked to register for Pearson Education Inc.'s MyLabs & Mastery service. Registering for this service transmits the information you submit into the registration page outside of Canada. You do not need to input accurate personal registration information into this service because an anonymized token links your Pearson account to your Blackboard account at UNBC which does not rely on your registration information.

You are responsible for making a request to Pearson Education Inc. to dispose of your personal information from their servers. The Centre for Teaching, Learning and Technology will provide you support in contacting them if you need.

If you have any questions regarding how your personal information is managed between Pearson Education Inc.'s MyLabs & Mastery service and UNBC's Blackboard service, contact Clarence Hofsink, Senior Lab Instructor for the Centre of Teaching, Learning and Technology at 250-960-6679 or clarence.hofsink@unbc.ca

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

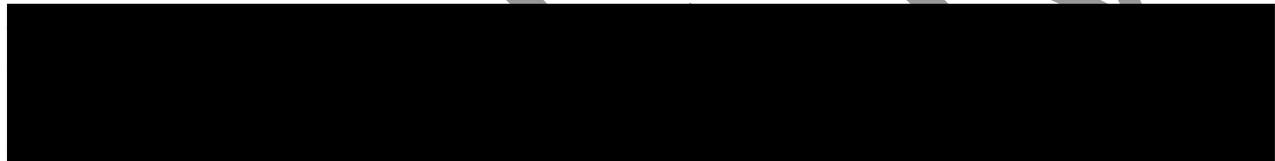
Part 3 – Security of Personal Information

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).



12. Please describe the technical 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.



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?

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

Each user in Blackboard has a unique identifier that is generated by Blackboard. So while the course roster may show two John Smiths, behind the scenes, Blackboard knows them as two unique Users.

Matching the user's Blackboard account to their Pearson account happens the very first time the student clicks on a link to access the MyLab from within their Blackboard course. The MyLabs and Mastering remote plug-in passes the unique user identifier over to the Pearson server. When the user is asked to sign-on to their Pearson account, the Pearson server then stores their unique user identifier with their Pearson account credentials. From then on, every time the student accesses their Blackboard course and clicks a link into the MyLab their unique user identifier is passed and Pearson knows which student it is. This linkage between the unique user identifier and Pearson account ensures that all scores and activity information is associated with the correct student record.

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

Yes, performance data turns into grades in the Grade Centre of the Blackboard Learning Management System.

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 will be expected to ensure that Pearson has transmitted information to the Grade Centre on the date that the final assignment for the student, including any extensions provided, and to keep a record of the last date Pearson pushed information to Blackboard when all assignments are expected to be submitted.

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?

Students will receive guidance and support from the Centre for Teaching, Learning and Technology to request the deletion of their own personal information from Pearson's servers. Students will be accountable for requesting Pearson removes the student's own information as indicated in the acknowledgement window.

Part 5 – Further Information

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

No. Aggregated performance data linked to a Pearson account is pushed back to UNBC.

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

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.

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.

COMPLETED

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

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.

COMPLETED
INITIATIVE

Privacy Impact Assessment

Pearson MyLabs and Mastering

PIA# 19-005 (Office of the University Secretariat to assign)

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

Part 7 - Program Area Signatures

Clarence Hofsink

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

[Redacted Signature]

Aug 27, 2019
Date

Anne Sommerfeld

Director or Dean Overseeing the
Program/Project

[Redacted Signature]

Aug 26/19
Date

Annette Doyle

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

[Redacted Signature]

27 August 2019
Date

Adam Cullum

Information Governance Officer
(Privacy Officer)

[Redacted Signature]

30 August 2019
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.