

Privacy Impact Assessment

VSim Wolters Kluwer (the Point)

Amendment to PIA# 16-023 (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/foipppa>.

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 School of Nursing		
PIA Drafter:	Caroline Sanders		
Email:	caroline.sanders@unbc.ca	Phone:	(250) 960-5848
Program Manager:	Trevor Smith		
Email:	trevor.smith@unbc.ca	Phone:	(250) 960-6768

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

1. Description of the Initiative

To expand the use of VSim as identified in PIA 16-023 to include all future instances of NURS 317 and NURS 318 courses at UNBC. The PIA Amendment will also address that individual instructors may alter how they use the tool to assess the students from the specifics identified in PIA 16-023. The simulations continue to be used primarily as a learning opportunity to enhance clinical experience, specific theory knowledge, and to enhance student reflective practice clinically and academically.

2. Scope of this PIA

This PIA will cover any NURS 317 and NURS 318 courses using VSim for Nursing, Pediatrics & Maternity through the BScN program at UNBC. This PIA will cover the initial personal data collected by Wolters Kluwer in order for students to set up their online account and access the software, and the performance data generated by students in their activities using the software.

3. Related Privacy Impact Assessments

Amendment to PIA 16-023.

Privacy Impact Assessment

VSim Wolters Kluwer (the Point)

Amendment to PIA# 16-023 (Office of the University Secretariat to assign)

4. All Elements of Information or Data

According to the Privacy Statement provided by Wolters Kluwer, the following information may be collected during the registration process:

- name; work address; email address; telephone number or study concentration or practice specialty (collectively "Personal Data").
- demographic information that constitutes Personal Data, including information such as: age; gender; any special content/topic interests.

As part of the interactions with the Online Services provided by Wolters Kluwer, they may also:

- Collect online analytics tools on the Online Service to retrieve browser information, operating system version, IP address, access times, students' referring website addresses, the pages and content students view within the Online Service, and search terms they may use to find content within the Online Service.
- Use technologies, such as cookies and web beacons placed by WK, to collect information about the pages viewed, links students click and other actions they take on the Online Service.

The instructors will be assigning a grade to students which become part of their student record based on their participation in the clinical simulations.

For students wishing to not use this product, an alternative assignment of 2 case based learning scenarios and 1 written reflective assignment will be provided. The weight (%) of this alternative assignment will be the same as what the student completing the VSim assignment receives.

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.

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

Back-up servers for Wolters Kluwer thePoint services are located in Somerville, Massachusetts in the United States of America. Students will need to acknowledge and provide informed consent to allow the instructors to use this service to assess them.

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>	
<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 Information Governance Officer to discuss the requirements of a data-linking initiative.</p>	N/A

Privacy Impact Assessment

VSim Wolters Kluwer (the Point)

Amendment to PIA# 16-023 (Office of the University Secretariat to assign)

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.	Purchase the code for the online service either through the lww.com online store or through the UNBC bookstore.	Collection	26(d)
2.	Student registers for a thePoint account by entering their access code, agreeing to the terms of service and providing their first name, last name, UNBC email, status as a student, workplace (this can be marked as Nursing	Collection	26(d)

Privacy Impact Assessment

VSim Wolters Kluwer (the Point)

Amendment to PIA# 16-023 (Office of the University Secretariat to assign)

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	<i>education), specialty, password, security question and security answer</i>		
3.	<i>The instructor adds a student to a class using the instructor's My Classes profile which generates a class code for the students to enter into the student's profile connecting the student with a specific course.</i>	Collection	26(d)
4.	<i>The student completes the pre-simulation, simulation and post-simulation activities and creates a score for individual attempts at the simulation. The pre-simulation is not graded while the simulation and post-simulation activities are assessed by the VSim program. Results of the scoring are broken down between simulation and post-simulation quiz scores. Simulation scores show the number of incidents of omission or commission by low, moderate and high risk for patient harm categories. Post simulation quizzes are graded by percentage of correct responses. An overall score of these two scores is provided on the My results page.</i>	Collection	26(d)
5.	<i>Students continue attempting a simulation and post-simulation quiz until an overall score of 80% is reached. Each attempt is recorded as a separate entry with a total grade and breakdown of simulation score and post-simulation quiz score.</i>	Collection	26(d)
6.	<i>Instructor goes into the backend of the service and collects a record that students have completed scenarios to 80%. Completion of simulations to standard contributes to the student's clinical hours which determine the grade the student receives.</i>	Collection / Use	26(d), 32(a), 32(b)
7.	<i>Instructor grades student and submits grade to the Registrar's Office as per standard process.</i>	Disclosure	33.1(1)(e)

Privacy Impact Assessment

VSim Wolters Kluwer (the Point)

Amendment to PIA# 16-023 (Office of the University Secretariat to assign)

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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.	[Redacted]			[Redacted]

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Privacy Impact Assessment

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Amendment to PIA# 16-023 (Office of the University Secretariat to assign)

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10. Consent Notice

University of Northern British Columbia

NURS 317 and 318 Courses Across All UNBC Campuses

Consent Notice Regarding the Disclosure of Personal Information
While Using VSim for Nursing - Maternity and Pediatric by Wolters Kluwer

I understand that by purchasing and using VSim for Nursing - Maternity and Pediatric on thePoint online service, I am providing my personal information including first name, last name, UNBC email address, status as a student, and the university I am studying at. I have the option of choosing to provide more information to Wolters Kluwer and I recognize I will be responsible for choosing to provide more information than necessary.

I am also aware that thePoint tracks each attempt I make to complete a simulation and will track any high risk behaviors I perform within each individual attempt of any simulation which could reflect poorly on me in the case of a data breach at Wolters Kluwer. I understand that my instructor accesses my performance data in order to ensure my score has reached 80% to allow these simulations to contribute towards my clinical and/or theory course performance. This information is stored on thePoint's backup servers located in the United States in Somerville, Massachusetts.

I am responsible for contacting Wolters Kluwer to correct any inaccurate information on my thePoint profile while I am using the service. While I will receive support from my instructor, I am responsible for contacting Wolters Kluwer to have my own personal information removed from thePoint's servers when I am finished using Wolters Kluwer's services.

My instructor will give me a link to Wolters Kluwer's privacy statement which I am responsible for reading. If I am concerned about how my personal information will be managed on thePoint's servers, I understand that I may choose not to use this simulation service, but I will be responsible for completing the alternative assignment(s) and/or clinical hours required to be successful in this course.

By signing I state that I understand the associated risks with using VSim for Nursing – Maternity and Pediatric simulation service, and that I know if I have further concerns that are not addressed above, I will contact my instructor to work through my concerns as soon as they arise.

Name (Print): _____

Signature: _____

Date: _____

Privacy Impact Assessment

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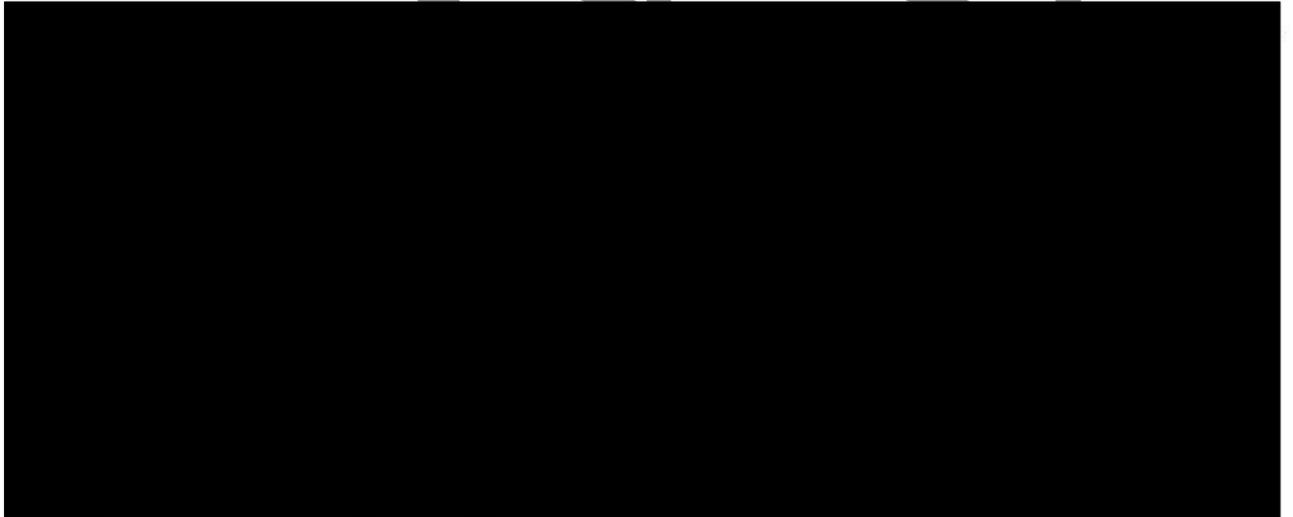
Part 3 – Security of Personal Information

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).



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



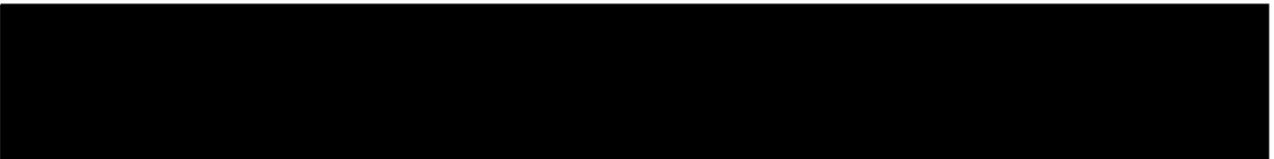
13. Does your department rely on any security policies? If so, indicate here:



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.



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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?

Students are responsible for updating or correcting their own information within the Wolters Kluwer system. As per their privacy statement, "WK will allow individuals reasonable access to their Personal Data to verify, correct or delete their data, where inaccurate."

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

Successful completion of 80% on each simulation may be recorded as clinical hours and/or used as a measure of theory content achievement.

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.

Students will be responsible for monitoring their own user profiles on thePoint and the instructor profile will also contain student names corresponding to how the students have performed. If the student has a concern about accuracy of information, the instructor and student can contact technical support to ensure information is accurate and that there have not been technical errors made within thePoint service.

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 instructor will keep any records collected that aids in determining the student's academic and/or clinical performance for one year. The instructor will shred or erase the records after one year. The instructor will inform students that they need to request their own records be erased from Wolters Kluwer's thePoint databases when the courses are finished and they no longer need access to the software. The instructors will ask that any information about the students on their instructor profiles will be erased from thePoint servers after a year.

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Part 5 – Further Information

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

No. Students provide their personal information once upon registration. According to their Privacy Statement, Wolters Kluwer “may process and share aggregate user and usage information and preferences among users of the Online Service. WK may track user and usage information, derived primarily from IP addresses, account registrations and cookie data. WK will use such information for statistical purposes and management of the Online Service, and may also share such aggregate information with others in non-personally identifiable form.”

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.

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

According to Wolters Kluwer’s privacy statement: “WK may process and share aggregate user and usage information and preferences among users of the Online Service. WK may track user and usage information, derived primarily from IP addresses, account registrations and cookie data. WK will use such information for statistical purposes and management of the Online Service, and may also share such aggregate information with others in non-personally identifiable form.

UNBC will not use any personal information generated in the courses within the scope of this PIA for research or statistical purposes.

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.

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.

UNBC will not generate a personal information bank from this initiative.

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

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Part 6 – Information Governance Officer Comments

The Consent Notice must be provided to students with time for an adequate review of the contents of the notice, and an opportunity for the students to ask questions, express concerns and the option to reject the use of the software. Each student must sign and date an individual form and this form must be retained by the instructor for one year after the end of the academic year.

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.

Each instructor using this software must be briefed by the UNBC School of Nursing on managing the informed consent of the students and providing an alternative to using VSim in cases where students do not consent to using the service. Students cannot be forced to consent or be penalized for refusing or revoking consent to send their information to the United States of America.

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Part 7 - Program Area Signatures

Caroline Sanders		August 9/ 2017
Name of Individual leading the Program/Project (Normally the individual who completed the PIA)	Signature	Date
Trevor Smith		Aug 9/17
Program/Department Manager or Project Sponsor	Signature	Date
N/A		
Contact Responsible for Systems Maintenance and/or Security (if applicable)	Signature	Date
Adam Cullum		Aug 4/2017
Information Governance Officer		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.