

Part 1 – General

Name of Department/Branch:	Langara College, Information Technology		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
Email:	irajotte@langara.ca	Phone:	604-323-5660
Program Managers:	Patricia Cia, Director, Academic Innovation David Cresswell, Chief Information Officer		
Email:	pcia@langara.ca dcresswell@langara.ca	Phone:	604-323-5243 604-323-5929

1. Description of the Initiative

During the fall 2019 semester, Langara College will be upgrading from the Lynda.com web-based online learning delivery service to LinkedIn Learning as required by the service provider LinkedIn Corporation, a US-based company. LinkedIn Corporation acquired Lynda.com in 2015 and was in its turn purchased by Microsoft Corporation in 2016.

Currently, Langara employees and students are able to create accounts in Lynda.com to access learning resources, primarily video tutorials. All existing user accounts along with access to previously viewed content will migrate from Lynda.com to LinkedIn Learning as part of the upgrade process. LinkedIn Learning will provide the same functions and features of Lynda.com as well as additional features that are meant to improve the learning experience.

According to usage statistics compiled by Educational Technology, from August 2018 to August 2019 an average of 1,500 monthly users viewed over 5000 hours of Lynda.com videos. The large majority of users are students. Student and employee use is almost exclusively voluntary though a small number of Regular Studies and Continuing Studies courses (fewer than five at the time of writing) require students to view videos as part of their course work. Instructors cannot view their students' usage data.

Background:

In June, 2013 Langara purchased a College-wide subscription to Lynda.com to allow active faculty, staff and students with a current Langara email address to access its extensive library of not-for-credit instructional videos available free of charge and on-demand.

2. Scope of this PIA

This PIA covers the collection, use and disclosure of the personal information of students and employees in the LinkedIn Learning service, which is accessed through a web browser.

3. Related Privacy Impact Assessments

Not applicable.

4. Elements of Information or Data

Required:

- Student name
- Student email address
- Student's history of accessed learning resources
- Employee's history of accessed learning resources

NB: Information used to contact an individual at a place of work, such as email address and name, is not considered personal information under the Freedom of Information and Protection of Privacy Act.

Optional:

- Home contact information (address; telephone number)
- Identifiable facial image
- Organizational affiliation (faculty, staff or student)

When a student or employee first logs in to LinkedIn Learning, the individual is given the option to connect their LinkedIn Learning profile with their LinkedIn profile. If the user does not select this option, their LinkedIn Learning profile will not be shared with or displayed in LinkedIn. A student or employee may also deliberately choose to change their user settings to allow their profile information and/or history of accessed learning resources to be shared with users of other services external to LinkedIn Learning, such as Facebook and Twitter.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Yes. According to LinkedIn’s Privacy Policy, as of 11 months ago datacentres that store customers’ information are located in the United States and Singapore.

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>	<p>No*</p>
<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>	<p>No</p>
<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>	<p>No</p>
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	

*The individual controls any linking of their personal information in LinkedIn Learning with LinkedIn, Twitter, Facebook or any other external application based on their choice of user settings.

7. Common or Integrated Program or Activity*

<p>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.</p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	<p>Yes</p>
<p>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;</p>	<p>No</p>
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	<p>No</p>
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

8. Personal Information Flow Table

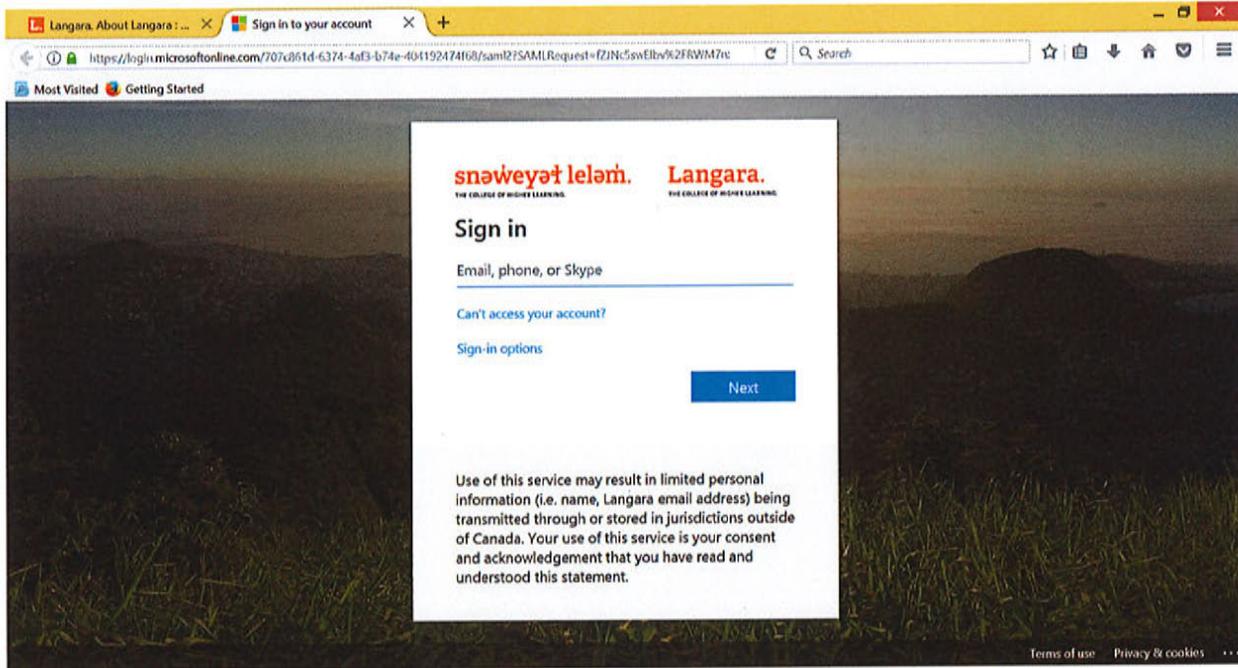
Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	When students sign in to LinkedIn Learning with Langara’s organization account, they will enter the College’s Organization URL (www.langara.ca) and then be prompted to enter their Langara email address and password. Prior to sign in, students will see the consent and acknowledgement notice below the sign in fields (see Section 10 on page 7).	Collection	26(c)
2.	Instructors may incorporate LinkedIn Learning resources into optional or required coursework, however instructors cannot view the history of their students’ access to, or completion of, course-related content. Instructors cannot view any other activity that a student performs on LinkedIn Learning or other services unless the student has configured their user settings to allow such access. Only LinkedIn Learning system administrators can view individual usage data.	Use	32(a)
3.	The College discloses students’ name and email address to LinkedIn Learning when a student signs in to the service. Under FIPPA, employees’ business contact information, such as name, email address, physical address, phone number and position are not defined as personal information. A user who has previously opted to link their LinkedIn Learning account with other external accounts, may revoke their consent at any time.	Disclosure	33.2(a)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access individuals' personal information and use or disclose it for purposes other than the reason it was collected.	System administrators are expected to abide by College policies related to ethical conduct, computer and computing use, access to student computer records, and access to information	Low	High
2.	The service provider's (LinkedIn's) employees could access personal information and use or disclose it for purposes other than the reason it was collected or disclosed.	s. 15(1)(I)	Low	High
3.	Personal information could be compromised during transmission to LinkedIn's datacentre.	s. 15(1)(I)	Low	High
4.	Client's personal information stored on service provider's server could be compromised.	s. 15(1)(I)	Low	High

10. Collection Notice

Prior to accessing LinkedIn Learning using Langara’s organization account, individuals will see the consent and acknowledgement statement below:



Screen shot of current federated sign in page (captured October 21, 2019)

Part 3 – Security of Personal Information

11. Please describe the physical security measures related to the initiative (if applicable).

s. 15(1)(I)

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

s. 15(1)(I)

13. Does your branch/department rely on any security policies?

Langara College has a policy and associated procedures that govern the collection, use, access, storage, disclosure and disposal of personal information. The College also has a Computer and Computing System Use Policy and a Managing Access to Student Computer Records Policy.

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.

s. 15(1)(I)

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

s. 15(1)(I)

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?

Users may update or correct any optional personal information that they have entered in their profile.

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

Not applicable. While instructors in a small number of courses require students to view LinkedIn Learning videos, there is no indication that instructors use this activity to make a decision about their final course grade.

18. If you answered "yes" to question 16, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

Users are completely responsible for ensuring that their personal information is accurate and complete.

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?

Not applicable.

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 your privacy office(r).

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

No. The College's LinkedIn Learning system administrators produce statistical reports of system usage at least annually, but access to personally identifiable information is not required.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

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.

No.

Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by Information Technology, Educational Technology and LinkedIn as of the date below. If, in future any substantive changes are made to the scope of this PIA, Information Technology and Educational Technology will complete a PIA Update and submit it to the Manager, Records Management and Privacy.

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

Oct. 23, 2019
Date

Part 7 - Program Area Signatures

s.22(1)

Patricia Cia, Director
Academic Innovation

24 October 2019

Date

s.22(1)

David Cresswell, Chief Information Officer

Oct 24 2019

Date

s.22(1)

Ben Cecil, Provost and Vice-President
Academic and Students

OCT. 24, 2019

Date