



# Privacy Impact Assessment for Non-Ministry Public Bodies

## WeVu Simulation File # 052019WV

### 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 privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

### 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/Branch:	Health & Human Services, North Island College		
PIA Drafter:	Lisa Richard		
Email:	<a href="mailto:Lisa.richard@nic.bc.ca">Lisa.richard@nic.bc.ca</a>	Phone:	250-334-5058
Program Manager:	Kathleen Haggith		
Email:	<a href="mailto:Kathleen.haggith@nic.bc.ca">Kathleen.haggith@nic.bc.ca</a>	Phone:	250-334-5215

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

### 1. Description of the Initiative

*The BSN program at North Island College has been used in clinical simulation as a core component of the program for many years. Simulations include cardiac arrest, palliation, client assessment, mental health, medication administration and mat/child, to name a few. Unfortunately, resource constraints mean that students do not get as much feedback and coaching as they need. Once solution to this problem is video recording of the simulations for feedback and reflection later. But until now, we have not has an adequate system that would allow instructors and students to benefit from recorded video of the simulation activities. In particular, we have lacked a platform where instructors can comment within the video software on precise moments in the recordings;*



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*and we have not had a convenient and secure way to share those videos with just the right students and groups of students. This initiative, using WeVu web application, will enable us to better use student-recorded video to accelerate and deepen learning of skills by enabling more practice and more and better feedback.*

## 2. Scope of this PIA

*This PA would cover the use of WeVu to upload, store, and discuss video files. Users are students, instructors, staff, and sometimes community partners. Users will access the web application from any internet-browser-enabled device. Use will be primarily from phones or in-lab computer webcams for recording and uploading video. Then, students will access the video for review from their own private laptop/desktop computers while institution staff will use program-owned and some instructor-owned computers.*

## 3. Related Privacy Impact Assessments

*There are no additional PIA's submitted for this initiative.*

## 4. Elements of Information or Data

*For users of the WeVu app:*

- *Email:* Section 21, Section 15(1)(I)
- *First name and last name:* Section 21, Section 15(1)(I)  
Section 21, Section 15(1)(I)
- *Password:* Section 21, Section 15(1)(I)

• **Section 21, Section 15(1)(I)**

### Consent:

*WeVu captures consent and asks users to confirm a terms of use agreement upon first login to being usage of the app.*

*WeVu can also capture consent and copyright assertions upon uploading of content, but this is not turned on by default. It can be enabled for any client who needs this.*

*These consent and copyright assertion answers is captured per user, and optionally per each media uploaded, and along with the date/time of assertion for audit purpose. Wordings of the Term of Use and Copyright Assertion documents can be customized for clients upon request.*



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*Only core WeVu technical staff can view the list of all users, due to the necessities of maintaining the back-end of the system and database. However, even the WeVu core staff can't decrypt users' passwords and client organization UIDs (AKA. SSO UIDs).*

*WeVu is a SaaS multi-tenant app. Each "tenant", for example `app.wevu.video/tenantName`, is completely separated from one another, and even system administrators of one tenant cannot access any data in another tenant.*

*Each tenant usually corresponds to a client organization, or for large organizations, a faculty/department within Systems Administration access can be granted per tenant to core support staff of the client organizations.*

*Only site owner/administrator (Aka. Instructors and detaching assistants) in a course can see the emails and names of users/students in that site/course.*

*A site user can only see the names, but not the email, of other users within the site, if those other users make a discussion post or share a video in that site.*

*There is a site setting that allow site admins/instructors to automatically anonymize all posts, showing only the role of the post authors, instead of exact names.*

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

*Identity information, user-input text, and videos in WeVu are all stored in Microsoft Azure's two Canadian datacentres and only in those datacentres. Backup and redundancy is also geo-restricted to the Canadian datacentres. Data is encrypted in transit and travels through the open internet, which in normal circumstances is within Canada if the user is within Canada.*

*Only Microsoft personnel and ISIT Technology (WeVu) support personnel located in Canada will be able to access data and videos stored in the WeVu service and as specified in the WeVu Terms of Service, this access will only be for the purpose of providing the WeVu service to the program and to end-users (students and instructors).*

### 6. Data-linking Initiative\*

**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.**

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;	N/A
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.	N/A
<b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b>	



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## 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>	
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;	N/A
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	N/A
<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>	

**\* 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). Contact your public body's privacy office(r) to determine how to proceed with this notification and consultation.**

**For future reference, public bodies are required to notify the OIPC of a "data-linking initiative" or a "common or integrated program or activity" in the early stages of developing the initiative, program or activity. Contact your public body's privacy office(r) to determine how to proceed with this notification.**

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

*Example:*



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Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>Instructor or Program staff require that students create an account on the WeVu service with clear communication of the intention, benefits to the students, and privacy protocols in place</i>	None	
2.	<i>Student provides email address, name, and chooses a username on the WeVu web application. Or, in the case of SSO-integrated deployment, the student signs on with their instructional SSO credentials</i>	Collection	26 (c)
3.	<i>Student uploads self-recorded videos of themselves and fellow students practicing the skills they are learning, or Educational program staff record student activity in simulation labs on campus and upload those videos to WeVu.</i>	Collection	26 (c)
4.	<i>Instructor and program staff review videos to provide feedback and assess student performance.</i>	Use	32 (a)
5.	<i>In some cases, students watch and review each other's performance in groups where the names of the students are visible to each other. Students cannot see each other's email addresses.</i>	Use and Disclosure	32 (a), 33.2 (a)
6.	<i>Instructors or program staff download usage data or assessment from WeVu.video onto institutional computers for the purposes of entering student grades into the campus grades system. The data from WeVu is not disclosed anywhere or to anyone outside the educational program.</i>	Use and Disclosure	32 (a), 33.2 (a)



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## 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Loss and disclosure of student names and email addresses and course enrolment</i>	<i>Use and enforcement of internal standards that restrict access to the information at both the educational institution and by staff of ISIT Technology. (Employees of both sign agreements for acceptable use of student information and abide by institutional policies for privacy and information security). Use of certified and audited cloud infrastructure (Microsoft Azure).</i>	<i>Low</i>	<i>Low</i>
2.	<i>Unintended public exposure/availability of student learning activity and skills practice videos</i>	<i>See above. WeVu is designed to allow download of videos only when instructor or program staff have permitted this and obtained consent from those who appear in the videos. Student names are not associated with video files unless the student himself/herself has given the video a title including his/her personal information. This will be discouraged by both the educational program and within the software.</i>	<i>Low</i>	<i>Low</i>
3.	<i>Student upset that they were unaware that this is a cloud-hosted service</i>	<i>The URL for the service beings with "app.wevu.video", clearly differentiating it from North Island College websites. Users are presented with a Terms of Service and referred to WeVu's Privacy and Acceptable Use policies and must consent to the terms before accessing the site.</i>	<i>Low</i>	<i>Low</i>



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## 9. Collection Notice

Syllabi for the course will include the following language:

This course uses the WeVu application for recording of student skills practice for the purpose of self-reflection, instructor feedback, and assessment.

To access the WeVu service you must create an account in WeVu by providing your email address, name, and username you choose. This is information you have already provided to North Island College as a student for use by us to provide you with academic programs. The full privacy notification can be viewed [HERE](#). For further information about the collection and use of this information you may contact the FIPPA Analysis located at 2300 Ryan Road, Courtenay, BC V9N 8N6 or email [ffoip@nic.bc.ca](mailto:ffoip@nic.bc.ca).

All private information is used in accordance with North Island College's Policy 1-01 Freedom of Information and Protection of Privacy and WeVu's Terms of Use, Privacy Policy, and Acceptable Use Policy. WeVu is a web application hosted and backed up entirely in Canada and the makers of WeVu, ISIT Technology, are a BC-based business.

When you participate in recorded activities and online dialogue, the video and associated text is stored only in the WeVu system and will remain in that system to be accessed securely only by students and instructors in the course and by WeVu support and technical staff for the sole purpose of providing the WeVu service. Your private information will not be divulged or shared with any other person or body. If you have any concerns about your privacy and data security in the WeVu system, please contact your instructor and [support@wevu.video](mailto:support@wevu.video) immediately.

## **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 your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.*

### **10. Please describe the physical security measures related to the initiative (if applicable).**

*The data resides in the Microsoft Azure cloud and access is available only to approved and authenticated users. Videos recorded at North Island College will be housed on secure computers in locked areas in addition to being uploaded to the WeVu site. Videos recorded by students or instructors on their personal devices remain their property under their control. Users may delete media from their devices after uploading to WeVu.*



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

## Section 21, Section 15(1)(I)

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

13. 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.

*WeVu provides standard role-based access so that only instructors and program staff can see all student's email addresses and names, and instructors see this information only for students in their own courses. This data is, in any case, available to them on other platforms at the institution prior to the use of WeVu. This data is always used for the purposes for which it was collected and abides by the institution's policies with respect to privacy, acceptable use of information technology, and information security.*

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

*WeVu stores logs of user access, user role changes, and most user behaviour that involves playing video or contributing to a dialogue about that video. These analytics are available to instructors and the program staff for analysis and for assigning credit for participating in the simulation activities. They will be made available to the appropriate institution staff, ministry staff, and law enforcement under appropriate conditions. WeVu may also use this data to improve its services as specified in WeVu's Terms of Services.*

### **Part 4 – Accuracy/Correction/Retention of Personal Information**

15. 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 will always be able to update their own information. They may cancel their account at any time after consultation with their academic program. Their data will be fully deleted and returned to them upon request and in consultation with NIC Staff.*



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

The recording of student activity may be evaluated by academic staff and this evaluation may be part of a student's grade in the course, as specified in each course syllabus.

- 17. 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?**

*North Island College will ensure that access to the data stored in WeVu is available for at least one year from the last day of the academic term in which the course was offered.*

## **Part 5 – Further Information**

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

*No*

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

*No. Educational research may be conducted using the data in the system, but only at the aggregate level and without any personally identifiable information as part of the database. If this research is proposed, it must go through the Behavioural Research Ethics Board at the institution.*

- 20. 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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## **Part 6 – Privacy Office(r) Comments**

*This privacy impact assessment was build upon access to a similar PIA from Selkirk College, which was vetted through their legal department. Intuition specific information has been obtained from NIC's IT department, and from the Health & Human Services Department. WeVu's Terms of Service, Privacy Statement and Acceptable Use of Technology support the development of this PIA.*

Lisa Richard

Privacy Officer/Privacy Office  
Representative

Lisa Richard

Signature

July 07 / 2019

Date



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*[Insert Initiative Title]*

PIA#[assigned by your privacy office(r)]

## Part 7 - Program Area Signatures

*K. Haggith*

Kathleen Haggith, Dean Health & Human Services

*[Handwritten Signature]*

Signature

*July 31/19*

Date

*[Handwritten Signature]*

Lisa Domae, Executive Vice President Academic & COO

*2019 07 04*

Signature

Date

A final copy of this PIA (with all signatures) must be kept on record.

***If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.***