Privacy Impact Assessment for Non-Ministry Public Bodies

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Use this privacy impact assessment (PIA) template if you work for or a service provider to a non-ministry public body in B.C. and are starting a new initiative or significantly changing an existing initiative.

Before you start

- If you are in a non-ministry public body, you may use this template to document a PIA. This template leads you through a complete PIA but you are welcome to use another template or method for documenting your PIA

- An initiative is an enactment, system, project, program or activity

- Find information on the PIA review process and question-by-question guidance.

- If you have any questions, email Privacy.Helpline@gov.bc.ca or phone 250 356-1851

PART 1: GENERAL INFORMATION

PIA file number:

Initiative title:	Grade Export D2L Brightspace to Student Record System
Organization:	Vancouver Island University
Branch or unit:	Center for Innovation and Excellence in Learning
Your name and title:	Jacqueline Kirkham, Learning Technology Application Developer
Your work phone:	250-753-3245 ext 2916
Your email:	jacqueline.kirkham@viu.ca
Initiative Lead name and title:	Jana Orton, Manager, Enterprise Systems
Initiative Lead phone:	250-667-2167
Initiative Lead email:	Jana.Orton@viu.ca
Privacy Officer:	
Privacy Officer phone:	
Privacy Officer email:	

General information about the PIA:

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Related PIAs, if any:
D2L Brightspace PIA - BCNET

1.   What is the initiative?

This initiative aims to simplify the process for instructors who need to enter students' final grades into the Student Record System (SRS) each semester. Currently, instructors who use VIU's learning management system (LMS) VIULearn (D2L Brightspace) need to manually enter final grades into the SRS in order to submit official final grades at the end of each term. This initiative will give instructors a button within the SRS final grade entry that allows them to import published final grades from VIULearn into the SRS, saving them the work of manually typing these grades and minimizing the potential for transcription errors when inputting final grades.

Instructors will have an opportunity to edit their final grades (for example, they may want to round a decimal point in a grade or add in bonus points that were not included in the VIULearn grade calculation) before submitting their final grades through the SRS.

This process will also improve data security by eliminating the need for instructors to send exports or screen shots of their final grades to a record clerk by email to get assistance entering final grades from VIULearn into the SRS system.

2.   What is the scope of the PIA?

This PIA covers the use of the Brightspace API to allow a connection between VIULearn and the SRS system in order to export grades, ███████████████████████████████ to facilitate authentication and grade data transfer, and the workflow within the SRS to import final grades.

3.   What are the data or information elements involved in your initiative?

This initiative does not store any data. It allows for users to transfer data they can see in VIULearn to the SRS. In order to facilitate this data transfer the program has access to student's unique IDs, course enrollments for instructors and students, and released final grade values. When an instructor instigates a transfer, a command is sent to the LMS which matches students in the SRS classlist with those same students in the LMS and sends the released final grade

value for each student to the SRS. Only a listed instructor in the SRS system can trigger this data transfer process.

3.1 Did you list personal information in question 3?

Yes

4. How will you reduce the risk of unintentionally collecting personal information?

This project will allow users to interact in new ways with data they already had access to. In order to use the API connection to VIULearn to copy the Final Calculated Grade value into SRS, an instructor must be the instructor of the course. As such, they would be able to see the same grade information inside VIULearn that they are exporting to SRS.

This system is designed to retrieve final course grades from VIULearn. There is a legitimate business need for this information as SRS is the official repository of student grade information. This process does not retrieve or store any new types of data, it is simply automating what has always been a manual process.

End user agency does not change. It has always been the course instructor (or sometimes delegate) who enters the grades into SRS. That will continue with the instructor reviewing the grades being retrieved from VIULearn and giving the final authorization to record them in the student's permanent record.

Consequent to this need, the system will retrieve a list of students in the course. It must also have access to basic structural information such as Organization Unit information (terms, departments, etc). No personal information is contained in the Organization Unit data. Organizational data in VIULearn is created by exporting data from the SRS, so this information is also information that is already stored in the SRS system.

Instructors are only able to retrieve grade information for their own courses. This is controlled by the SRS front end which has information on which courses the instructor has been assigned (the same process which is currently used to limit the class lists the instructor can view)

The use of ███████████████████████████ means that the login credentials (username/password) for the VIULearn service account are not recorded anywhere and need only be known to the VIULearn administrator. The scope parameter assigned by ██████ limits the data which can be retrieved ███████████████ .

In VIULearn, the user that is created for ███████████████ will have the minimum access permissions required in order to access grades data for all courses. Only users with an Administrator role in VIULearn will be able to see or make changes to this account. Users with this role ███ . Our vendor VIULearn does also have the ability to access and adjust all settings and users in our

account on an as needed basis. Vendor access to our instance is governed by our agreements with D2L. For more on privacy and security within the VIULearn environment see the D2L Brightspace PIA.

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5.   Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: On the enter final grades screen for a course within the SRS, the instructor presses the "Import grades from VIULearn" button. ███████ ████████████████████████ ████████████████████████ █████████████ Within SRS ███████████████ ████████████████████████ ███████████████ retrieve grade information (student number and grade) for the students in the course. The ██████ procedure matches this information to the students in SRS and returns a	use	32 (a)	

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
list of students and grades to the user's web browser. The web browser displays the grades retrieved for review by the instructor.			

Optional: Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

6.   Collection Notice

N/A

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7.   Is any personal information stored outside of Canada?

No

8.   Does your initiative involve sensitive personal information?

No.

9.   Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

N/A

10.   Where are you storing the personal information involved in your initiative?

Personal information is not stored anywhere it was not previously stored as part of this initiative. This initiative is only to streamline the transfer of data between the Brightspace LMS and the VIU SRS system

which both store student data including enrolments and final grades.

After you answer this question go to Part 5.

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization's Privacy Officer.

11. **Is the sensitive personal information stored by a service provider?**

Type "yes" or "no" to indicate your response.

- If yes, fill in the table below (add more rows if necessary) and go to question 13
- If no, go to question 12

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

12. **Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.**

13. **Does the contract you rely on include privacy-related terms?**

Type "yes" or "no" to indicate your response.

- If yes, describe the contractual measures related to your initiative.

15. **What controls are in place to prevent unauthorized access to sensitive personal information?**

16. **Provide details about how you will track access to sensitive personal information.**

17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.

> **Outcome of Part 4**
>
> The outcome of Part 4 will be **a risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

18.   **Does your initiative involve digital tools, databases or information systems?**

Yes

18.1   **Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?**

No.

19.   **What technical and physical security do you have in place to protect personal information?**

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See the D2L Brightspace PIA for details of how D2L protects VIU data within VIULearn.

20.   Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
We only allow employees in certain roles access to information	
Employees that need standing or recurring access to personal information must be approved by executive lead	
We use audit logs to see who accesses a file and when	
Describe any additional controls:	- Only employees assigned as an instructor for a course can access the grade import option in SRS for the course. These users already have access to the data they are importing through VIULearn so do not gain any additional access to data through this initiative. - We use ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮ so the credentials used to authenticate in VIULearn are not stored anywhere. - The ▮▮▮▮▮▮ in VIULearn can only access the data required for the transfer of grades. For example, this user account cannot see student's names or submitted work. The only information the integration can access is course enrollments (which originally come from the SRS), student numbers which are used to match students

Strategy	
	between the SRS and the LMS, and final grade values. ● Only System administrators ████████ ████████████████████████ ████████████ have the ability to see and edit the ████████. Our vendor D2L does also have the ability to access and adjust all settings and users in our account on an as needed basis. Vendor access to our instance is governed by our agreements with VIULearn. For more on privacy and security within the VIULearn environment see the D2L Brightspace PIA.

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

21. How will you make sure that the personal information is accurate and complete?

Instructors have the ability to adjust imported final grades prior to submitting these grades. If students feel their grades are inaccurate, they can dispute their grades per the Grade Dispute policy at VIU. Students' student number and course enrollments are managed in the SRS and passed to the LMS every 12 hours. If there is a problem with students' personal information in the SRS they can work with the Records or Registration departments to have this information corrected. Changes made in the SRS are sent to VIULearn automatically every day at 6:00 am and 6:00 pm.

22. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

22.1 Do you have a process in place to correct personal information?

Yes

22.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

N/A. All data used in this initiative can be corrected within the SRS.

22.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

N/A

23. Does your initiative use personal information to make decisions that directly affect an individual?

No

- If yes, go to question 25
- If no, skip ahead to Part 7

24. ~~**Do you have an information schedule in place related to personal information used to make a decision?**~~

~~FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. In addition, the Information Management Act requires that you dispose of government information only in accordance with an approved information schedule.~~

~~Type "yes" or "no" to indicate your response.~~

- ~~If no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.~~

PART 7: AGREEMENTS AND INFORMATION BANKS

Please provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank.

25. **Does your initiative involve an [information sharing agreement](#)?**

No.

26. **Will your initiative result in a personal information bank?**

No.

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

27. **Risk response**

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Add new rows if necessary.

Possible risk	Response
Risk 1: Unauthorized individuals could access the personal information in the system and use or disclose it for personal purposes (within VIU)	Employee Code of conduct and Non-disclosure agreements; Use of Information & Technology Policies, password protected access, user access to system, based on need to know basis, permission restrictions, controls, and monitoring.

Possible risk	Response
Risk 2: Personal information data is compromised in transit.	Data in transit is encrypted ███████ .

PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative			

Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Program Area Comments:

Role	Name	Electronic signature	Date signed
Initiative lead			
Program/Department Manager			
Contact Responsible for Systems Maintenance and/or Security Only required if they have been involved in the PIA			
Head of public body, or designate Only required if personal information is involved			