PIA01741 — Wingspan

PRIVACY MATTERS
@ UBC

1.1   Executive Summary

Wingspan is an online virtual classroom and collaboration. It is a cloud-based solution and has a mobile component. Wingspan allows an instructor to build own courses, live lecture with video, display presentation slides within Wingspan platform, download document out of Wingspan (not recordings), engage discussion forums, recordings of lecture and discussion, submit assignments or projects, view own score dashboard, view calendar for assignment due, view social media, and able to access via a mobile device. The project is broken down into phases: pilot phase and next phase. The outlined features are included in the pilot phase. Wingspan also facilitate an exam proctor, gamify, email and push notification, etc.; however, these may be included in the next phase of the project. For the pilot phase, Wingspan does not integrate with any other systems and there will not be any CWL integration.

1.2   Project Description and Scope

UBC Sauder School of Business is looking to implement a new Learning Management System, Wingspan. As a pilot, it will be initially launched for the UBC Course Number BA 532B - GNAM: Global Network Week. It is the same course but named differently under Global Network for Advanced Management (GNAM) program, "Urban Resilience: Cities in a Post-COVID World - From Crisis and Recovery to Reinvention and Resilience". Professor Murali Chandrashekaran is looking to test it out for this class and see if it is worth it to use it again in the future. The class will be held for 16 weeks. It is a for-credit course virtually offered to GNAM members comprising of 32 global partner institutions. Approximately 40-50 students enroll to the course. Students will be from UBC and a number of other Canadian and International institutions. A grade and a simple customized completion certificate are issued to fulfill the course completion. Such information of students is shared with their institutions. These educational experiences are provided on a voluntary basis by participating institutions as part of diffused participation. The cost of putting on a course is borne by the host institutions.

Scope The personal information collects and stores via the following components are in scope of this PIA. These components will be implemented in the pilot phase:
- Live lecture + VDO + collaboration
- Assignment/project submission
- Score dashboard
- Calendar (e.g., assignment reminder, etc.)
- Social media feed
- Mobile component

Inclusions: In-scope components of Wingspan to be implemented in the pilot phase are in scope of this PIA.

Exclusions: Wingspan offers more features however the following components are excluded from this PI:.
- Exam proctor
- Gamify
- Email and SMS push notification
- Others which are not included in the pilot phase

In addition, this PIA excludes review of:
- physical security measures of a student's environment and computer / device
- logical security measure of a student's computer / device
- review of the processes in regards to reviewing recordings of teaching and learning sessions

RISK CLASSIFICATION
The inherent privacy risk classification level of this PIA submission is 4 – **High**.
The residual risk classification level of this PIA submission at closure is 4 – **High**.

1.3   Risk Mitigation Table

The following privacy and security focus areas have been identified. Agreed mitigation strategies should be applied to the project implementation. As part of the final PIA completion the Owner will be asked to accept the report including risk treatment plan.

1.4   Risk Mitigation Table

Privacy Risks					
Description	**Reference #**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Inadequate third party information sharing controls	RK0020236	4 - High	4 - Major	Mitigate	4 - High
	Mitigation Plan: The project includes measures to ensure Wingspan's terms of use and privacy policy are aligned with UBC requirements.				
Retaining PI longer than necessary	RK0020239	4 - High	3 - Significant	Mitigate	4 - High
	Mitigation Plan: The project involves collaboration with partner institutions to align with data retention and destruction requirements. - In a case of termination of Wingspan, the project to ensure that the "end of services and data destruction" as required by UBC Outsourcing and Service Provider Access Standard be followed.				
PI stored / accessible outside of Canada	RK0020198	4 - High	4 - Major	Mitigate	4 - High
	Mitigation Plan: The project includes measures to manage temporary access requirements for the Wingspan team, ensuring compliance with international access standards.				
Not ensuring individuals are informed about collection	RK0020235	4 - High	4 - Major	Mitigate	4 - High
	Mitigation Plan: The project to develop and implement the privacy notice and consent language.				
Lacking third party legal agreements for information sharing	RK0020237	4 - High	4 - Major	Mitigate	4 - High

	Mitigation Plan:
	1. The project to include the following privacy provisions in the contract agreement with Infosys/Wingspan.
	   a. Personal information collected without authorization (Collection/use for the purposes beyond a UBC program or activity (i.e., the vendors purposes))
	   b. Personal information disclosed without authorization (Disclosure to subcontractors or third parties without suitable contractual protections.)
	   c. Personal information not stored long enough / too long (Destruction at contract termination/at request)
	2. The project to arrange for Infosys/Wingspan support team sign on the Security and Confidentiality Agreement prior the access to UBC data be granted. Infosys/ Wingspan must agree to protect any information they may access and to comply with B.C.'s privacy legislation.				

IT Risks					
Description	**Reference #**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Weak or absence of information security design controls	RK0020238	4 - High	4 - Major	Mitigate	4 - High
	Mitigation Plan: The project to includes mitigation measures to address concerns identified with third-party logins on the Wingspan login page.				

Security Risks					
Description	**Reference #**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Use of third party applications with inadequate controls	RK0020241	4 - High	3 - Significant	Mitigate	4 - High
	Mitigation Plan: The project involves collaborating with Wingspan to establish comprehensive security controls. • a mechanism to handle different type of vulnerability issues and required time frames. • a process to monitor for intrusion attempts and compromises through monitoring of server logs, file size and integrity and other indicators. • a password protects and encrypts all backups using AES 128-bit encryption at a minimum. - system event logging on all servers and records at a minimum user login, logout, actions performed by the user, the time it was performed, and access to or modification of records. • all events in logs are time stamped to a precision of a minimum of one millisecond, and retained for at least 90 days and protected from unauthorized access and modification. • a process to monitor for unusual administrative activities e.g., after hours system accesses, failed logins, continually (or manually on monthly basis at a minimum)."				
Weak or absence of technical security controls	RK0020240	4 - High	4 - Major	Mitigate	4 - High
	Mitigation Plan: The project includes initiatives to align password security settings with the UBC standards through collaboration with wingspan.				

1.5   Analysis and Findings
None provided.

1.6   Conditions of Approval
None provided.

1.7   Review and Distribution
The Minister of Citizens' Services Direction 2-21, *Privacy Impact Assessment Directions* requires that all PIAs "designate the appropriate level of position that holds accountability for a PIA, proportionate to the sensitivity of the personal information and/or the risks of the initiative" (s. D8).

Accountability is maintained by the role or position, regardless of who fills the role.

Under UBC Policy SC14, Administrative Heads of Unit are responsible for:
- ensuring that UBC Electronic Information and Systems are secured with adequate controls, with particular care concerning User identification and validation measures;
- ensuring, as appropriate or required, that UBC Electronic Information within their area of responsibility is maintained, transmitted, and stored in a secure and consistent manner that adheres to all relevant University policies and standards;
- authorizing access for individuals to UBC Electronic Information and Systems within their area of responsibility;
- renewing, retiring, and revoking User authorizations within their area of responsibility.

Holding accountability for the privacy risks of this initiative includes:
- reviewing the mitigation strategies listed in the relevant risk tables and ensuring those strategies are maintained throughout the life of the initiative;
- ensuring accountability is transferred to any individual who assumes this role;
- if there are any changes to the initiative, including to the way personal information is collected, used, stored or disclosed, ensuring the PIA team is engaged, and if necessary, completing a PIA update; and
- understanding what your privacy obligations are, and if not, following up with the PIA team.

Assessment Acceptance
Murali Chandrashekaran

Distribution
Requestor: Yulia Semiryakova **Project Manager**: Yulia Semiryakova **Owner**: Murali Chandrashekaran **Risk Advisor**: Pimkae Saisamorn

PIA Request Submission	Report Completion
2020-07-24	2020-09-02