Privacy Impact Assessment (PIA) for Poodll Media

Before you start

- This Privacy Impact Assessment (PIA) form is used by VCC to assess whether a new initiative, or proposed significant change to an existing initiative, meets the privacy protection requirements of the B.C. *Freedom of Information and Protection of Privacy Act.* FIPPA's protection of privacy requirements. A PIA is a legislative requirement (FIPPA s. 69(5.3)) and mandatory before implementing an initiative.

- You/Your refers to the individual responsible for drafting this PIA, who should be an individual from the relevant department or program area with sufficient knowledge to do so. The PIA must be signed by the role within the program area with the appropriate position to hold accountability for this initiative.

- Please include references to other documents when applicable, but do not insert or embed any documents to/in this assessment form.
- Please review the initial assessment questions and contact the Privacy Office at privacyandfoi@vcc.ca before you begin the form, if you have not already. See more guidance about the PIA process, including the supplementary Guidance Document, on the myVCC Privacy website.

PART 1: GENERAL INFORMATION

PIA file number: 2025-005

Initiative title:	Poodll Media
VCC Department / Program Area:	CTLR
Link to VCC initiative website:	Moodle.vcc.ca
Link to vendor website:	Poodll.com
Link to vendor privacy policy:	https://poodll.com/privacy-policy
Your name and title:	Andrew Dunn, Manager Online Learning
Your work phone and email:	adunn@vcc.ca
Initiative Lead name and title:	Andrew Dunn
Initiative Lead phone and email:	adunn@vcc.ca

General information about the PIA:

Is this initiative a data-linking program under FIPPA? See the definition in **Schedule 1 of FIPPA**. If this PIA addresses a data-linking program, the Privacy Officer must submit this PIA to the **Office of the Information and Privacy Commissioner**.	No
Is this initiative a common or integrated program or activity? See the definition of **Schedule 1 of FIPPA**. Under section **FIPPA 69 (5.4)**, the Privacy Officer must submit this PIA to the Office of the Information and Privacy Commissioner.	No

Does this initiative involve a regular or systematic exchange of personal information between organizations? If yes, this initiative may require an **Information Sharing Agreement**.	No
Related PIAs, if any: BCNET - Moodle	

1. What is the initiative?

Poodll is a company located in Japan and provides software and services for language teaching, and online audio and video recording within the context of a Moodle site (Moodle Certified Integration). VCC's Centre for Teaching, Learning, and Research intends to purchase and use the Poodll Media suite of plugins that enable audio and video recording to support online learning activities through Moodle at VCC. VCC's Moodle is administered by BCNET. s. 13(1)

Poodll Media is a suite of plugins that integrates with the Moodle Learning Management System to enable students and instructors to record audio or video directly into Moodle HTML areas, assignments, and quizzes. VCC intends to use Poodll's "Cloud Poodll" cloud storage option, and this suite of plugins includes Cloud Poodll for Atto/TinyMCE, Cloud Poodll Question, Poodll Assignment Submission and Assignment Feedback, additional Poodll players and widgets, and capabilities for automatic subtitles and transcription functions within these plugins.

Poodll Media plugins provide a secure and integrated way for students and instructors to communicate, learn, and be assessed on Moodle. The integration of audio and video recording into Moodle ensures that any recordings are more secure and streamlined (students previously would have to record and then upload) and audio and video recordings for assignments or instructor feedback can be accessed within the same Moodle learning environment. Poodll Media plugins provide students with the option to use recordings anywhere they may use Moodle's HTML text editor function, including forum posts, which also provides more accessibility options when using Moodle; Poodll plugins enable the use of audio and video recording in existing Moodle plugins like TinyMCE.

As integrated plugins, Poodll relies on user and course data as provided by Moodle. Unlike most Moodle plugins, Poodll uses separate cloud storage for audio and video recordings and servers for generating transcripts of recordings; s. 15(1)(l) .

Instructors may use recordings created through Poodll Media plugins for assessment and grading, like other coursework submitted through Moodle, and according to the same records management requirements. s. 15(1)(l) .

2. What is the scope of the PIA?

This PIA covers the collection, use, and disclosure of personal information by Poodll Media plugins through its integration with VCC's Moodle system. Moodle is outside the scope of this PIA.

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

Poodll Media plugins are built into VCC's existing Moodle platform and is accessed through existing VCC credentials and institutional access to Moodle.

Moodle shares data with Poodll to enable the use of plugins, which typically includes:

- User Data: Basic user information such as usernames and roles (e.g., student, teacher) to manage access and permissions.
- Course Data: Details about the courses, including course structure and content, to ensure Poodll tools are correctly embedded and functional within the Moodle environment.
- Activity Data: Information about specific activities and assignments, such as quiz questions or assignment submissions, to facilitate audio and video recording, automated grading, and feedback.

Poodll plugins enable the collection of audio or video recordings directly from users (students, instructors). Audio and video recordings are likely to be of the users themselves and may include additional personal information. Some Poodll Media plugins also enable screen recordings. IP addresses may also be collected by Poodll to be used in logging/administration of services.

Users can also submit written comments and feedback with or for recordings, collected directly from the users. Poodll plugins will also record names and emails of users who submitted recordings (student data shared from Moodle), dates and times of submissions, submission file type, and last modified dates for assignments submitted through Poodll, and instructors can directly input grade and record feedback (video, audio, or written comments) through the Poodll Assignment Submission plugin. Poodll Media plugins generates transcripts of these recordings after they are submitted to Moodle; the transcript function can be configured to be available to both instructors and students, or only instructors.

3.1   Did you list personal information in question 3?

Yes: Audio and/or video recordings; transcripts; written comments/feedback; data related to submissions and modifications; potential content of recordings, transcripts, and comments.

Recordings and transcripts generated from recordings may contain additional personal information depending on what is recorded, likely including an individual's views or opinions.

- If yes, are all of the personal information elements **necessary** for your initiative?
  - Yes

Note: Instructors and students using Poodll will be given guidance to limit the amount of personal information requested or provided, to ensure that only what is necessary is collected. Instructors should not require students to record submissions that divulge unnecessary or sensitive personal information about themselves.

4.   If you answered "no" to question 3.1: How will VCC reduce the risk of unintentionally collecting personal information?

N/A

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 flow

Poodll Media consists of plugins that are integrated into VCC's Moodle learning environment and so the exact information flow depends on how students and instructors both are utilizing plugins. This table reflects possible use cases.

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	FIPPA authority or other legal authority	Specify any potential risks
Instructors may use Poodll plugins to create quizzes or assignments for students that require the use of audio or video recording and assign them to classes/students.	Use	32(a)	
Students use Poodll Media plugins to record audio or video submissions in quizzes, assignments, or anywhere where a text-editing function exists in Moodle, such as forum posts (optional). Students may also submit written comments with their recordings when submitting assignments.	Collection	26(c)	Potential over-collection: students' recording of audio or video may contain unnecessary and/or sensitive personal information.
For public scenarios, other Moodle users (students, instructors) may view recorded responses within the Moodle classroom where the recordings were posted.	Use	32(a)	
For submissions for quizzes or assignments, instructors may be notified when students submit responses via Poodll Media plugins.	Use	32(a)	
Instructors may opt to be notified of students submitting quizzes or assignments.	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	FIPPA authority or other legal authority	Specify any potential risks
Instructors access students' quizzes or assignments for assessment and assign grades.	Use	32(a)	
Instructors and/or students may use transcription function to assist with their learning or assessing students' work, depending on Poodll configuration.	Use	32(a)	
Instructors may record audio or video feedback, or provide students with written comments as feedback, during assessment.	Collection	26(c)	
Instructors download gradebooks from Poodll/Moodle environment at the end of the course per VCC Retention Schedule & Moodle policy, and recordings & transcripts are destroyed by Poodll at the end of the retention period.	Disclosure Disposal	33(2)(c) 31	

6.   Collection Notice and Consent

6. 1 Collection Notice

There is not a unique collection notice for Poodll Media as they are plugins to VCC's Moodle system. CTLR will develop guidance for instructors and students around good privacy practices for using the audio and video recording and transcription functions available through Poodll Media plugins.

6. 2 Consent

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: s. 15(1)(l)

8. **If you answered yes to Question 7: Where are you storing the personal information involved in your initiative?**

N/A

9. **Does your initiative involve <u>sensitive personal information</u> that will be stored outside of Canada?**

N/A

- If yes, go to <u>question 10</u>
- If no, skip ahead to <u>Part 5</u>

10. **If you answered "yes" to Question 9: Is the sensitive personal information being stored outside of Canada only because it is being made available to the public under an enactment that authorizes or requires the information to be made public (<u>FIPPA section 33(2)(f)</u>)?**

[Answer: Yes or No]

- If yes, what enactment?
    - [Answer] then skip ahead to <u>Part 5</u>.
- If no, go to <u>Part 4.</u>

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section **only if you answered yes to Question 9: you are disclosing sensitive personal information to be stored outside of Canada**. This section <u>will require consultation with a representative from IT Services.</u>

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

[Answer: Yes or No]

- If yes, fill in the table below (add more rows if necessary) and then go to <u>question 13</u>

- 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. **If you answered "no" to Question 11: Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.**

[Answer]

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

[Answer: Yes or No]

- If yes, describe the contractual measures related to your initiative.
    - [Answer]
- Is VCC's Privacy Protection Schedule or Privacy Protection Schedule for Cloud Services appended to the initiative's contract? [Answer: Yes or No]

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

[Answer]

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

Describe how you will know if the sensitive personal information is accessed, including access by service providers (e.g. logging access to data). Consult with IT Services to answer this question.

[Answer]

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

Privacy risk	Impact to individuals (low, medium, high)	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.

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 and/or your vendor need to make sure that the personal information is safely secured in both physical and technical environments.

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

    Yes.

    - If yes: Are these digital tools, databases, or information systems new to VCC?
        - Yes for Poodll Media plugins; Moodle is not new.

    17.1 If you answered "yes" to Question 17: Do you or will you have a security assessment to ensure the initiative meets the security requirements of FIPPA s. 30?

    No.

    - If no, continue to question 18.

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

    Poodll:

s. 15(1)(l)

- When users upload recordings via Poodll plugins, recordings are not accompanied by any metadata which could reasonably be used to identify the individual.

s. 15(1)(l)

VCC:

- Access to recordings relies on security and role-based access within Moodle s. 15(1)(l)

- Access to recordings depends on permissions assigned within Moodle to courses and role-based (instructor, administrator, etc.).

- s. 15(1)(l)

- All users (students, instructors, VCC staff) are required to follow VCC FIPPA, cybersecurity, and records management policies and procedures and will respond to/report any breaches.
- Students and instructors will be advised to provide the minimum amount of personal information possible when using Poodll and provided with guidelines.

19. Controlling and tracking access

Strategy	
We only allow employees in certain roles access to information:	Yes: PI collected via Poodll is limited to students' Moodle classes and quizzes/assignments can only be viewed and responded to by the assigned instructor ("Teacher" role). s. 15(1)(l) Poodll employs role-based accounts internally as well.
Employees that need standing or recurring access to personal information must be approved by their managerial lead:	Yes: Instructors are assigned to courses for the term of the course and given access to their courses for the duration of the course. s. 15(1)(l)
We use audit logs to see who accesses a file and when:	Poodll logs when users submit recordings via quizzes or assignments s. 15(1)(l)
Describe any additional controls:	N/A

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.

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

Audio and video recordings recorded with Poodll plugins are collected and submitted directly from the individual, who have the ability to review and submit their recordings. Transcriptions created by Poodll from recordings may not be accurate but should only be used to assist in using the records and not used for assessment purposes.

21. Requests for correction

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

Recordings would only be able to be corrected by re-submitting a recording; the ability to do this could be limited if the recording were for a quiz, assignment, or other assessment.

21.2 Sometimes it's not possible to correct the personal information. FIPPA s. 29 requires that you make a note on the record about the request for correction if you are not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes: instructors can make notes on file for any requests. The customer (VCC) can also request that end user data (student, instructor) be deleted from Poodll, if needed, via Moodle security features.

21.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FIPPA s. 29 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 -- Personal information in Poodll will not be disclosed to any third party.

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

Likely yes: Poodll recordings that are submitted for assessment (quizzes, assignments, forum posts if applicable to grading in the course, etc.) will be assessed by instructors and grades assigned to students.

23. If you answered "yes" to Question 22: Do you have a records retention schedule in place related to personal information used to make a decision?

Yes: TE-400 (Student Assignments and Examinations), TE-600 (gradebooks) and Moodle Course Lifecycle Procedures and Recommendations.

Instructors are required to download their gradebooks from Moodle and retain them in accordance with TE-600. Moodle course shells are retained for 36 months to meet TE-400 and other records retention requirements. s. 15(1)(l)

. CTLR may alter Poodll's default retention period via site administration.

PART 7: PERSONAL INFORMATION BANKS

24.   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.

25.   Risk response

Possible risk	Response / mitigation strategies
Over-collection of personal information through audio and video recordings.	Guidance for students and instructions: to avoid providing sensitive personal information in recordings; to design assignments and prompts to avoid collecting students' personal information; and to communicate that recordings and transcripts are stored on Cloud Poodll (separate from Moodle but within Canada) and students may request their deletion.
s. 15(1)(l)	s. 15(1)(l), 13(1)
s. 15(1)(l)	s. 15(1)(l)

PART 9: SIGNATURES

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

Privacy Office Comments

This PIA should be revised if any significant changes are made to the Poodll Media initiative, or if CTLR finds that there are additional features within Poodll Media's plugins that collect, use, or disclose personal information (e.g. any assessment/grading tools). Instructors should always verify any information generated about students through AI or other services.

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	Caralee Maloney	Caralee Maloney — Digitally signed by Caralee Maloney Date: 2025.04.16 14:32:06 -07'00'	2025-04-16

Program Area Signatures

The PIA must be signed by a role that is able to hold accountability for a PIA, proportionate to the sensitivity of personal information and/or the risks of the initiative. This signature confirms that this PIA accurately documents data elements and information flow at the time of signing. If there are any changes to the overall initiative, including the way personal information is collected, used, stored, or disclosed, the program area will contact Privacy and, if necessary, complete a PIA update.

Program Area Comments:

Role	Name/Position	Electronic signature	Date signed
Role designated accountable for the initiative	Andrew Dunn, eLearning Manager	Andrew Dunn — Digitally signed by Andrew Dunn Date: 2025.04.16 14:46:19 -07'00'	2025-04-16

Role	Name/Position	Electronic signature	Date signed
Contact Responsible for Systems Maintenance and/or Security	Director IT and EA		2025-10-15