



PIA #: 2024-073

Canvas Cloud – Discussion Summary Amendment

PRIVACY TRACKING

PIA number: [2024-073](#)

System / project:

Unit responsible:

Date of meeting: [n/a](#)

Present during meeting: [n/a](#)

Notes taken by: [Ernest Soares & Peter Onota](#)

Date approved:

QUESTIONS FOR INITIATIVE LEAD

1. Please provide a description of the program/ initiative (what is the purpose/objective of initiative?)
 - a. Canvas Cloud is a cloud-based Learning Management System (LMS) developed by Instructure, designed to enhance online and hybrid education for educational institutions, businesses, and organizations. It provides tools for creating, organizing, and delivering course content, including multimedia materials, quizzes, and assignments. The purpose of this project is to migrate from the self-hosted, open-source version of SFU's Canvas Learning Management System (LMS) to the vendor-hosted Canvas Cloud product. SFU's centrally supported LMS serves as a foundational platform for teaching and learning. An average of 26,000 undergraduate and graduate students enroll in Canvas courses each term. With Canvas Cloud, SFU has an opportunity to take advantage of functionality that is not available in the self-hosted, open-source version.
 - b. Instructure's Discussion Summaries (also known as Discussion Summarization) is a feature within Canvas that uses generative AI to create concise summaries of discussion threads. It's designed to help instructors quickly grasp the main points, themes, and tone of class discussions. These summaries include highlights such as key ideas, important questions, and illustrative quotes.
 - c. This tool is intended for instructors only; students do not have access to the generated summaries.
 - d. Instructure's AI discussion summarization tool operates entirely within its AWS data center, with no data leaving the environment or being processed by third parties. Course discussion prompts and replies are shared with the AI model for summarization

but are not stored or reused by the model itself. Prompts may be retained internally for quality assurance purposes, though they are not exposed, and access by SFU would likely require a special support request. Overall, data remains securely contained within Instructure's AWS environment, with limited retention practices focused solely on quality assurance.

2. **Has a contract been signed with the vendor/third party?** (if yes, send to privacy team for review)
 - a. Yes

3. **Was SFU's Privacy Protection Schedule (PPS) or Cloud Privacy Protection Schedule (CPPS) appended to the contract? If not, why not?**
 - a. Yes

4. **What Personal information (PI) elements are being collected** (e.g. email addresses, IP addresses, assignment work)?
 - a. Name
 - b. SFU ID (student or employee number)
 - c. SFU or external email address
 - d. Course enrollments
 - e. Additional personal information as entered by the student (profile details, assignments, quizzes, opinions in published posts and comments)

5. **What non-personal information elements are involved in the initiative** (i.e. what other information is being collected):
 - a. Key points, student ideas and course discussion threads.

6. **Is the information necessary for the initiative?**
 - a. The collected information is necessary to quickly summarize key points, questions, and ideas from student course discussion threads, providing instructors with synthesized overviews to support teaching in large-format or high-volume discussion environments.

7. **Is the information sensitive** (i.e. is the information one of the following types of information: medical or financial information, detailed identification information (e.g. driver's license number, SIN number, date of birth))?
 - a. No
 - b. While students may choose to enter sensitive information into a discussion thread, an advisory notice will be provided to remind them not to share sensitive information in these spaces.

8. **What information is newly collected by the initiative or has already previously been collected by the university but is now being put to a new use** (e.g. student email addresses are already known, and may be newly used in this software)?
 - a. N/A
 - b. Though any sensitive information added to the discussion thread despite the Advisory Notice will be newly collected.

9. **How and from whom is the newly collected PI collected?**
 - a. Directly from the person to whom the information pertains.

10. **Please complete the Collection Notice below:**

Collection and Advisory Notice

- a. The Discussion Summaries feature in Canvas Cloud collects personal information on behalf of SFU under the authority of the *University Act* (RSBC 1996, c.468) and the *Freedom of Information and Protection of Privacy Act* (RSBC 1996, c.165). The personal information collected includes name, SFU ID (student or employee number), SFU or external email address, Course enrollments, and any additional personal information you choose to provide within your profile details, assignments, quizzes, or contributions to course discussion boards (including published posts and comments).

Students are strongly advised not to include sensitive or confidential information—such as health details, financial information, or other personally identifying content—within their discussion posts or comments, as this information may be processed by the feature

This collection is directly related to and necessary for the University's administration of its academic programs. The information is used to enable instructors to access AI-generated **summaries of discussion threads**, which highlight key points, themes, questions, and ideas contributed by students. These summaries are intended to support instructors in managing and teaching courses, particularly in large-format classes or courses with high-volume discussion activity, by providing them with a synthesized overview of student engagement.

If you have any questions about the collection and use of this information please contact [[Position Title, Business Address or Email, Business Phone Number](#)].

11. Where will the Collection Notice be placed

- [Privacy Protection Notice - Canvas Support - Simon Fraser University](#)

12. How will the PI be used?

- Collection:** Course Discussion prompt and replies are shared with the AI model (Claude 3 Haiku) hosted in Instructure's AWS environment, but the data is not stored or reused by the model.
- Access:** Course Discussion prompt and replies can be access by the AI model (Claude 3 Haiku) hosted in Instructure's AWS environment
- Use:** Course Discussion prompt and replies are shared with the AI model (Claude 3 Haiku) hosted in Instructure's AWS environment, but the data is not stored or reused by the model.
- Disclosure:** Prompts are stored for quality assurance but not exposed currently.
- Retention:** Prompts are stored for quality assurance but not exposed currently. Instructure could likely get SFU access to them, but it would likely have to come as a one-off support-style request.
- Storage:** Course Discussion prompt and replies are shared with the AI model (Claude 3 Haiku) hosted in Instructure's AWS environment, but the data is not stored or reused by the model.

13. Is the information used to make decisions that will affect the individual?

No.

The AI does not make decisions on behalf of instructors. Instead, it provides a tool to assist instructors in reviewing and interpreting discussion content more efficiently.

- If yes, how long will the records containing the information be retained?**
- Is there a retention schedule for the records being created by this program/initiative? If yes, please provide the RRSDA number (a list of RRSDA's can be found at <https://www.sfu.ca/archives/records-management/directory-of-university-records.html>)**
 - RRSDA-1995-018 Examination Papers, Course Assignments, and Grades
 - RRSDA-1999-002 Course Files

14. What is the process to correct the PI if requested by the affected individual? (if no process exists, will you rely upon the University's procedure for making changes and corrections to

personal information? The University procedure can be found at <https://www.sfu.ca/archives/fippa/changes-corrections.html>)

- a. SFU has a process in place to correct or annotate an individual's personal information upon request: <https://www.sfu.ca/archives/fippa/changes-corrections.html>

15. Who will have access to the PI?

- a. SFU instructors and the AI model (Claude 3 Haiku) hosted in Instructure's AWS environment

16. Are there any foreseen disclosures of the PI?

- None other than those stated above.

17. Role designated accountable (who would be responsible for monitoring the program/initiative and advising the Privacy Team if the program changes how or what personal information it collects, uses, or discloses?)

- Director, Application Services

18. Has an SFU IT security representative determined that this software employs reasonable security arrangements (if so, who?)

- a. No.

QUESTIONS FOR PRIVACY TEAM

Legal Authority for collection, use, and disclosure

- Collection: 26(c)
- Use: 32(a)
- Disclosure: 33(2)(d)

Privacy risks and responses/mitigations

