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Learning Management System "Canvas@SFU"
PRIVACY ASSESSMENT CHECKLIST
for IT SERVICES integrating EXTERNAL LEARNING TOOLS

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University

1 Purpose

This checklist is used by IT Services to determine if integrating an external learning tool with the University's Learning Management System "Canvas@SFU" at the full system level meets or will meet the protection of privacy requirements under the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA). The checklist is a risk management tool to identify and understand potential privacy issues, allowing correction and mitigation, thus avoiding costly system or process re-design, privacy complaints or breaches and harm to personal, professional and institutional reputation.

See Schedule A for definition of terms in bold text and Schedule B for additional information about how to answer section 2.1 and the numbered statements in Section 3 of the checklist.

2 General Information

2.1 External Learning Tool

Identify the external learning tool you propose to integrate. Complete one checklist per tool.

Name of tool:	Google Docs
Type of tool:	<i>Check all that apply</i> <input type="checkbox"/> Library resource <input type="checkbox"/> E-book <input type="checkbox"/> Video tool <input type="checkbox"/> E-portfolio <input checked="" type="checkbox"/> Collaboration tool <input checked="" type="checkbox"/> Presentation/authoring tool <input type="checkbox"/> Homework tool <input type="checkbox"/> Assessment tool <input type="checkbox"/> Grading tool <input type="checkbox"/> Subject specific tool <input type="checkbox"/> Other (specify) _____
Name of vendor/supplier:	Google inc.

2.2 Contact

Identify yourself

Name:	Keith Fong		
Position Title:	IT Applications Architect		
Department:	IT Services		
Phone:	2-2038	E-Mail:	keith@sfu.ca

3 Privacy Assessment of the Proposed External Learning Tool

Answer the following statements to determine whether the external learning tool you propose to integrate with SFU's Learning Management System "Canvas@SFU" at the full system level will comply with protection of privacy requirements.

When using this learning tool:	
1. It collects new personal information from the students enrolled in a course that is <i>not</i> a ready passed through to the learning tool from a central SFU system (e.g., SIMS) via Canvas@SFU.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. It collects personal information from the students enrolled in a course that may or may not be passed back from the learning tool to Canvas@SFU. If you answer "Yes" to either statement please complete this entire checklist. If you answer "No" to both statements you do not need to answer statements #3 to #10 below because the external learning tool does not collect student personal information. You may use the external learning tool. Please skip to Section 4 to complete the remainder of this form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. It collects the minimum personal information about students that relates directly to and is necessary for the teaching and learning activity of a course.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. It collects the personal information directly from the student it is about.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. It gives students the personal information collection notice required by law.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. It sets technical security measures that only permit authorized access by users designated by the instructor, thereby protecting the students personal information against unauthorized access, collection, use, disclosure and disposal during and after the course ends.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7. <i>Answer the one statement that applies to this external learning tool (7.a., 7.b. or 7.c.):</i>	
a. It stores the students' personal information only on storage devices physically located at SFU within the Learning Management System "Canvas@SFU".	<input type="checkbox"/> Yes <input type="checkbox"/> No
OR	
b. It stores the students' personal information on storage devices:	
i. That are controlled by a service provider ,	<input type="checkbox"/> Yes <input type="checkbox"/> No
ii. The devices are physically located only <i>inside</i> Canada, and	<input type="checkbox"/> Yes <input type="checkbox"/> No
iii. SFU has signed a written agreement with the hosting service that includes SFU's Privacy Protection Schedule .	<input type="checkbox"/> Yes <input type="checkbox"/> No
OR	
c. It stores the students' personal information on storage devices:	
i. That are controlled by a service provider ,	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
ii. The devices are physically located <i>outside</i> Canada,	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
iii. SFU has signed a written agreement with the hosting service that includes SFU's Privacy Protection Schedule , and	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
iv. The instructor obtains students' express prior consent to disclose and access their personal information outside Canada using a procedure recommended by staff in the Teaching and Learning Centre.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

8. It retains the students' personal information for a minimum of one year following the semester in which the instructor teaches the course.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9. It uses the students' personal information only for the teaching and learning purpose of the course in which the students are enrolled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. It discloses the students' personal information only: a. Inside Canada. b. For the teaching and learning purpose of the course in which the students are enrolled, and c. To another SFU employee when the information is necessary for s/he to perform her or his employment duties.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>If you answered "Yes" to all of statements #3 to #10 above, you may integrate the external learning tool. Please continue to Section 4 to complete the remainder of this form.</p> <p>If you answered "No" to any of statements #3 to #10, <i>before</i> integrating this learning tool, please contact the Information and Privacy Coordinator or Officer in the Archives and Records Management Department to discuss the protection of privacy requirements. She or he will discuss with you what options there may be to integrate this external learning tool and comply with your responsibility to protect students' personal information as required by law under FIPPA.</p> <p>If, after consulting privacy staff, you determine that the External Learning Tool you propose to integrate is unable to pass this checklist, you cannot use the tool because it does not comply with protection of privacy requirements under FIPPA.</p>	

4 Submission

4.1 IT Services

1. Print your name, sign and date on the first line below in Section 5.
2. If you answered "yes" to all the statements in Section 3 above, send this completed checklist to: Privacy Officer, Archives and Records Management Department, SFU.
3. If you answered "no" to any of statements #3 to #10 in Section 3 above, send this completed checklist to the Information and Privacy Coordinator or Officer in the Archives and Records Management Department, who will discuss with you what options there may be to use this external learning tool and comply with protection of privacy requirements under FIPPA.
4. If, after consulting privacy staff, you determine that the External Learning Tool you propose to integrate is unable to pass this checklist, you cannot use the tool because it does not comply with protection of privacy requirements under FIPPA.

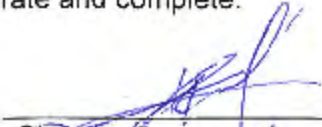
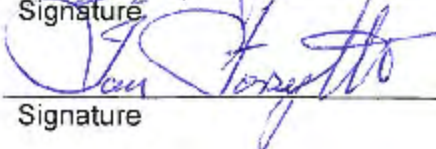
4.2 Privacy Coordinator or Officer

1. Review this completed checklist, which you received because the external learning tool that IT Services proposes to use may not comply with protection of privacy requirements under FIPPA.
2. Clarify any statement that is answered "no" and discuss with IT Services what options there may be to use this external learning tool and comply with protection of privacy requirements under FIPPA.
3. Document the outcome in a short note to file and attach it to this checklist.

- 4. Print your name, sign and date on the second line below in Section 5.
- 5. Retain on file this checklist as the University's Office of Record for Privacy Impact Assessments and FIPPA operations.

5 Signatures

The undersigned confirm that they have taken reasonable steps to confirm that the contents of this assessment are accurate and complete.

Keith Fong		November 26, 2014
IT Services	Signature	Date
IAN FORSYTH		December 1, 2014
Privacy Coordinator or Officer	Signature	Date



NOTE TO FILE

FILE TO	FOI004-20/PIA 2013-003/LMS Canvas	DATE	November 25, 2014
BY	Ian Forsyth, Coordinator of Information and Privacy	PAGES	1
SUBJECT	Results of ELT PIA for integrating Google Docs in Canvas at the full system level		

Result of privacy assessment

Google Docs fails the privacy assessment checklist in several ways (see answers to statements #3 and #6 - #10). This external app is **not** privacy compliant under the British Columbia *Freedom of Information and Protection of Privacy Act*.

Actions necessary to correct and mitigate non-compliance

1. The Canvas Privacy Protection Notice must be revised to clearly and explicitly:
 - a. Inform instructors who want to use Google Docs as a teaching and learning tool in a SFU course that they must obtain students' prior written consent.
 - b. Inform students who opt to use Google Docs for a course in which the instructor does not use it, that using Google Docs is completely voluntary and at their sole discretion.

The Coordinator of Information and Privacy is responsible for revising the Canvas Privacy Protection Notice.

2. The SFU departments responsible for supporting the delivery of the learning management system must communicate the notice widely, frequently and through multiple channels. In this case, IT Services, Student Services and the Teaching and Learning Centre are responsible for communicating the notice.

Definition of terms

Access	Disclosure of personal information by the provision of access to personal information.
Authorized access	Occurs when a person has access to personal information in the custody or control of the University that is authorized by the Act.
Collection notice	<p>Notice given in writing or orally to an individual from whom SFU collects personal information at or prior to the time of collection. The notice must describe:</p> <p>(a) the purpose for collecting it,</p> <p>(b) the legal authority for collecting it, and</p> <p>(c) the title, business address and business telephone number of an officer or employee of the public body who can answer the individual's questions about the collection.</p>
Disclose	<p>Reveal, show, expose, provide copies of, sell, give or tell.</p> <p>SFU may disclose personal information in its custody or under its control only as permitted under section 33.1, 33.2 or 33.3 of the Act.</p>
Employee	A person employed for wages or salary by the University. In relation to SFU, includes: (a) a volunteer and (b) a service provider (see also definitions for these latter terms).
Instructor	Individuals responsible for the teaching of credit and non-credit courses including professors, associate professors, assistant professors, professors emeritus, adjunct professors, visiting faculty, practitioner faculty, post-retirement appointees, lecturers, instructors, teaching assistants, tutors and markers, faculty associates, in-service associates, associate members and program coordinators.
Personal information	<p>Recorded information about an identifiable individual, other than business contact information, including but not limited to:</p> <ul style="list-style-type: none"> • names, home addresses and telephone numbers; • age; • sex; • marital or family status; • identifying number; • race, national or ethnic origin; • colour; • religious or political beliefs or associations; • educational history; • medical history; • disabilities; • blood type; • employment history;

- financial history;
- criminal history;
- images;
- anyone else's opinions about an individual;
- an individual's personal views or opinions; and,
- name, address and phone number of parent, guardian, spouse or next of kin.

Privacy Protection Schedule	A legal agreement prescribing the protection of privacy requirements with which a service provider must comply.
Service provider	A person retained under contract to perform services for SFU or a person with whom an employee automatically enters into an agreement by virtue of using their product or service and in so doing accepts the service provider's terms of use.
Technical security measures	Access controls on computer systems (i.e., passwords that allow different levels of access to various screens and differing capabilities to read, extract or change data), firewalls, virus protection and encrypted network transmission.
Unauthorized collection, use, disclosure and disposal	Occurs when a person who has access, whether authorized or unauthorized, to personal information in the custody or control of the University, collects, uses, discloses and disposes of that information and it is not authorized by the Act.
Use	Employ information to accomplish a specific purpose.
Volunteer	A person who provides a service to the University without being paid.

Section 2.1	Type of tool	<p>Learning tools may incorporate one or more features. Some examples to illustrate this are:</p> <ul style="list-style-type: none"> • Collaboration tool: Google Docs • Assessment tool: Turnitin.com • Video tool: Audio and video lecture recording • Subject specific, e-book, homework, assessment and grading tools: Pearson MyLabs
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Collection, Protection, Retention, Use and Disclosure of Personal Information
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Collection	Statement #1	<p>Collecting new personal information</p> <ul style="list-style-type: none"> • IT Services sends demographic data and class roster information from SIMS to Canvas@SFU to identify students and authorize their use of Canvas@SFU. The student personal information loaded into the learning management system is student first name, surname and common name (i.e., nickname, such as Al rather than Alan), student number, computing ID (i.e., login ID), email address and course enrolment • New personal information that an instructor collects using an external learning tool would be anything in addition to the above information. If this is the case when using an external learning tool, answer "Yes" on the checklist
	Statement #2	<p>Collecting personal information</p> <ul style="list-style-type: none"> • The instructor collects student personal information using an external learning tool. The tool is integrated with Canvas@SFU. The personal data may or may not be passed back from the learning tool to Canvas@SFU. If this is the case when using an external learning tool, answer "Yes" on the checklist
	Statement #4	<p>How personal information is to be collected</p> <ul style="list-style-type: none"> • SFU must collect personal information directly from the student the information is about and not indirectly from a third party (except in very limited and specified circumstances which do not apply when using Canvas@SFU)
	Statement #5	<ul style="list-style-type: none"> • SFU gives students a personal information collection notice when they logon to Canvas@SFU. It says: "The personal information obtained through

Canvas@SFU, the University's learning management system, and external learning tools, is collected under the general authority of the University Act (R.S.B.C. 1996, c.468). It is related directly to and needed by the University to operate its academic programs and provide instruction. The information will be used for teaching, learning, assessing student academic performance and assigning grades. If students have any questions about the collection and use of this information please contact the instructor for your course.

IT Services integrate learning tools with Canvas@SFU at the full system level that collect and store student and instructor personal data at SFU, inside Canada or outside Canada (e.g. Google Docs) only when the tool passes the External Learning Tool Privacy Assessment Checklist.

Instructors and the Centre for Online and Distance Education use external learning tools that may or may not be integrated with Canvas@SFU courses, which collect and store student and instructor personal data at SFU, inside Canada or outside Canada only when the tool passes the External Learning Tool Privacy Assessment Checklist.

Students are not permitted to integrate external learning tools with their "Canvas@SFU courses."

- If this notice adequately covers the student personal information an instructor will collect using an external learning tool integrated at the full system level answer "Yes" on the checklist. If this notice is inadequate, answer "No" on the checklist

Protection

Statement #6

SFU must protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal

The electronic system and digital media on which information is stored must be considered when deciding what reasonable technical security measures are necessary to adequately protect the personal information

Scenario #1:

- SFU's learning management system is configured so that the authorized status that occurs when a user logs into a Canvas@SFU managed-access course is automatically passed through to the external learning tool
- If this is true for the external learning tool integrated at the full system level, answer "Yes" on the checklist
- If this is not the case for the external learning tool integrated at the full system level, answer "No" on the checklist

Scenario #2:

- However, If the external learning tool enables an instructor to set technical security measures that designate only students enrolled in the course and other instructors who instruct the course (e.g , TAs) are authorized users, answer "Yes" on the checklist

Statement #7 Storage and access must be in Canada

- SFU must ensure that personal information in its custody or under its control is stored and accessed only in Canada except in very limited and specified circumstances

Statement #7.a

- In this case, all student personal information collected using an external learning tool would be stored automatically onsite, only on SFU servers used for the Canvas@SFU system

Statement #7.b

- In this case, the student personal information collected using an external learning tool would be stored automatically offsite, only inside Canada, on servers belonging to the service provider who supplies the tool (e.g., Pearson MyLab)

Statement #7.c

- In this case, the student personal information collected using an external learning tool would be stored automatically offsite, outside Canada, on servers belonging to the service provider who supplies the tool (e.g., Google Docs, Turnitin)
- Privacy staff may be able to recommend a notice in this situation that enables compliance with the Act

Retention Statement #8 Retention of personal information

- SFU must ensure that personal information is retained for at least one year after being used to make a decision that directly affects the student so that the student has a reasonable opportunity to obtain access to that personal information
- An example would be to appeal a grade
- The learning management system is configured to retain students' personal information for Canvas@SFU courses only when the data collected is stored on SFU servers
- When student personal data is collected using an external learning tool and it is automatically stored on SFU servers, answer "Yes" on the checklist
- If this is not the case because: 1) the data is stored elsewhere on a storage device hosted by a service provider and 2) there is no written agreement that stipulates the service provider will retain and

provide access to the data for the required one year time period, answer "No" on the checklist

Disclosure	Statement #10	<p>SFU may disclose personal information in its custody or under its control only as permitted by law inside or outside Canada</p> <ul style="list-style-type: none"> • The circumstances under which personal information may be disclosed inside or outside Canada are prescribed in very specific and limited terms, therefore, it is important to confirm that one has legal authority to disclose personal information before doing so • When student personal information is collected and used through an External Learning Tool that stores the data outside Canada, it is disclosed with legal authority only when the answer to statement #7.c.iv is "Yes" on the checklist • If IT Services answers "No" to statement #7.c.iv, the answer to statement #10.a must be "No" • Authorized end users (i.e., faculty, students and administrators) can access the information in Canvas@SFU worldwide over the Internet • SFU employees: Access to the learning management system from outside Canada is authorized if necessary to perform employment duties when an instructor is temporarily travelling outside Canada. In all other situations, access must be in Canada only • Students: When voluntarily accessing the learning management system from outside Canada, students are deemed to give SFU their consent to disclose their personal information outside Canada
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