



OFFICE OF THE VICE-PRESIDENT, LEGAL AFFAIRS
Archives and Records Management Department

PRIVACY IMPACT ASSESSMENT for Learning Management System “Canvas@SFU”

1 Purpose of the Privacy Impact Assessment (PIA)

This form is used by SFU to determine if a current or proposed policy, system, project, program or activity meets or will meet the protection of privacy requirements under Part 3 of the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA). The Act makes it a legal requirement that SFU conduct a PIA in accordance with the directions of the minister responsible for the Act. The PIA is a risk management tool to identify potential privacy issues and impacts, allowing correction and mitigation, thus avoiding costly system, program, service, or process redesign; privacy complaints or breaches; and harm to personal, professional and institutional reputation.

See Schedule A for definition of terms.

<i>Archives and Records Management Department use only</i>			
Office of primary responsibility	Vice-President, Academic	Approved date	Feb. 13, 2014
PIA #	2013-003	OIPC notified date	N/A
Type of PIA	<input type="checkbox"/> Department <input checked="" type="checkbox"/> Corporate <input type="checkbox"/> Update	OIPC response date	N/A
Type of PIA review (Check all that apply)	<input type="checkbox"/> Policy <input checked="" type="checkbox"/> System <input type="checkbox"/> Program <input checked="" type="checkbox"/> Activity	<input type="checkbox"/> Project	
Other applicable PIA provisions (Check all that apply)	<input type="checkbox"/> Common or integrated program <input type="checkbox"/> Information sharing agreement	<input type="checkbox"/> Data-linking initiative	

2 General Information

2.1 Unit and Program Area

Identify the Department and Program submitting this PIA

Department:	IT Services		
Program:	Canvas@SFU Implementation		

2.2 Contact

Identify the individuals best positioned to speak to the contents of this PIA

Name of PIA Drafter:	Dr. Jay Black		
Position Title:	Chief Information Officer		
Phone:	778-782-5807	E-Mail:	jpblack@sfu.ca
Name of Program Manager:	Dr. Bill Krane		
Position Title:	Special Advisor to the Vice-President Academic and Provost		
Phone:	778-782-3147	E-Mail:	krane@sfu.ca

2.3 Description of the Current or Proposed Policy, System, Project or Program

2.3.1 Background

Provide a general description of the initiative and the context in which it functions. This could include the purpose of the initiative and its benefits, what larger process it is part of, how it functions, the parties involved, etc. Describe in the sections immediately below specific details with respect to the individual actors involved in the business process, focusing (as applicable) on how their personal information will be collected, accessed, used, disclosed and retained.

Include copies of documentation that describe the business requirements, functional analysis, conceptual overview, etc. that helps explain the initiative.

The strategic vision of Canvas@SFU is to situate the University at the cutting edge of change in new and emerging teaching and learning developments and environments, as detailed in Canvas@SFU: A Foundation for Change (March 2013) and Canvas@SFU Action Plan (May 2013).

This vision is focused on the capacity of SFU to anticipate both the substance and the pace of change in educational technologies, and to gain and sustain advantage in delivering a highly flexible, adaptable, and forward thinking platform for online, online assisted, and blended learning.

The implementation plan is premised on the importance of creating digital tools of enablement through Canvas. These tools will guide teaching and learning practices toward participatory and active models of engagement, and support opportunities for instructors to hone, innovate and diversify pedagogical approaches.

Canvas is a Learning Management System (LMS) open source application and a platform for teaching and learning tools. It complies with the Learning Tools Interoperability (LTI) standard, designed to enable rapid and seamless plug and play integration of external learning tools that also conform to the LTI standard. The LTI open specification provides a vendor-neutral, common approach to synchronize software tools and the platform enabling rapid deployment of this enterprise application.

See <http://www.sfu.ca/canvas/implementation.html> for documentation.

2.3.2 Student Information

Disclosure: Secure data exchange processes automatically send student information (i.e., name, SFU ID (student number), SFU email address) from SFU's main Systems of Record (SIMS, SERA, AMAINT)¹ to Canvas@SFU in a system-to-system way. These exchanges are managed and controlled by IT Services. This same data may flow through to external learning tools that are integrated within or standalone from Canvas@SFU.

Access: Secure, centralized identity and group management mechanisms automatically send enrolled student information from the above Systems Of Record to authorized Canvas courses in a system-to-system way. The instructor of each course in Canvas@SFU is designated as an authorized user and permitted access only to the personal information about students enrolled in the course s/he is teaching.

Collection: Student assignment information that could include personal views or opinions as well as grades is collected within courses in Canvas@SFU.

Use: Student information is used within authorized Canvas courses for learning and assessment purposes.

Retention: Student information is retained in SFU's secured database infrastructure held within SFU's on-premise data centre in Canada.

2.3.3 Instructor (Employee) Information

Disclosure: Secure data exchange processes automatically send instructor information (i.e., name, SFU ID (employee number), SFU email address) from SFU's main Systems of Record (SIMS, SERA, CODE, HAP, Amaint) to Canvas@SFU in a system-to-system way. These exchanges are managed and controlled by IT Services. This same data may flow through to external learning tools that are integrated within or standalone from Canvas@SFU.

Access: Secure, centralized identity management mechanisms automatically send instructor data from the above Systems Of Record to authorized Canvas courses in a system-to-system way.

Collection: Instructor comments and personal opinions may be collected within courses in Canvas@SFU.

Use: Instructor information is used within authorized Canvas@SFU courses for teaching purposes.

Retention: Instructor information is retained in SFU's secured database infrastructure held within SFU's on-premise data centre in Canada.

2.3.4 Administrator / Supervisor (Employee) Information

Disclosure: Secure data exchange processes automatically send administrator information from SFU's main Systems of Record (HAP, Amaint) to Canvas@SFU in a system-to-system way. These exchanges are managed and controlled by IT Services. This same data may flow through to external learning tools that are integrated within or standalone from Canvas@SFU.

Access: Authorization to grant administrator access within Canvas@SFU to new support staff rests with the Directors of the support staff.

Use: Administrator information is used within Canvas@SFU for support and administration purposes.

Retention: Administrator information is retained in SFU's secured database infrastructure held within SFU's on-premise data centre in Canada.

2.4 Scope of this PIA

Explain exactly what the PIA covers and conversely what it does not.

This PIA covers:

1. The Canvas@SFU system that is wholly installed at SFU;
2. Learning tools that: 1) are integrated within Canvas@SFU at the full system level by IT Services, 2) the tool collects and stores personal data at SFU, inside Canada or outside Canada (e.g. Google Docs), 3) the External Learning Tool Privacy Assessment Checklist is completed and 4) the tool passes the checklist;
3. External learning tools that: 1) instructors or the Centre for Online and Distance Education (CODE) integrate within their Canvas@SFU courses using the LTI protocol, 2) the tool collects, enables data flow with Canvas@SFU, and stores personal data at SFU, inside Canada or outside Canada, 3) the External Learning Tool Privacy Assessment Checklist is completed and 4) the tool passes the checklist;
4. External learning tools that: 1) instructors or CODE do **not** integrate within their Canvas@SFU courses but they standalone from it and, using the LTI protocol, 2) the tool collects, enables data flow with Canvas@SFU, and stores personal data at locations other than SFU, inside Canada or outside Canada (e.g., Pearson MyLabs), 3) the External Learning Tool Privacy Assessment Checklist is completed and 4) the tool passes the checklist, and
5. Student use of external tools such as Gravatar (<http://en.gravatar.com>) that automatically sends their personal information from site to site and could include Canvas@SFU if it is enabled.

This PIA does not cover:

1. External learning tools integrated within or that standalone from Canvas@SFU, for which the External Learning Tool Privacy Assessment Checklist is **not** completed or the tool **fails** the checklist, and
2. External tools that students may integrate into their Canvas@SFU courses using the LTI protocol, that store personal data inside or outside Canada.

2.5 Related PIAs

Identify PIAs for other parts of the initiative or any PIAs that were previously completed for this initiative.

Using tools identified in section 2.4 as not covered by this PIA is not permitted until a related privacy impact assessment is completed for them.

2.6 Elements of Information or Data

List the types of personal information involved in the initiative. This could include the individual's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments, or opinions about third parties. See Schedule A for a partial list of types of personal information.

2.6.1 Student Data Elements

- Name
- SFUId (student number)
- SFU email address
- Course assignment work done by student (could include personal views or opinions)
- Educational history (e.g. grades; could include instructors' opinions about students)
- SFU non-email address or social media identity information if supplied by student
- Photo and biography if supplied by student

2.6.2 Employee Data Elements

- Name
- SFUId (employee number)
- SFU email address
- Personal views
- Opinions about students
- SFU non-email address or social media identity information if supplied by employee
- Photo and biography if supplied by employee

2.7 Storage or Access outside Canada

Provide a brief description of whether the personal information can be accessed from outside Canada. For example, by a service provider that is repairing a system, or if the information is being stored outside Canada, for example, in the "cloud". If the data is stored within Canada and accessible only within Canada, please indicate this and describe with whom and where it is stored.

The personal information in Canvas@SFU is retained in SFU's secured database infrastructure held within SFU's on-premise data centre in Canada.

No external service provider has access to the personal data in Canvas@SFU.

IT Services, instructors and CODE may use external tools within or apart from Canvas@SFU using the LTI protocol and data is stored inside or outside Canada by a service provider only when the Privacy Assessment Checklist for External Learning Tools is completed and the tool passes the checklist.

Authorized end users (i.e., faculty, students and administrators) can access the information in Canvas@SFU worldwide over the Internet.

2.8 Data-linking Initiative

In FIPPA, "data linking" and a "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative. If so, you must comply with requirements under the Act for a data-linking initiative.	
1. Personal information from one database is linked or combined with personal information from another database	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. The data linking is occurring between either: 1) two or more public bodies or 2) one or more public bodies and one or more agencies	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you answered "yes" to all three questions, please contact the Information and Privacy Coordinator or Officer to discuss the requirements of a data-linking initiative.	

2.9 Common or Integrated Program or Activity

In FIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 questions, you must comply with requirements under the Act for common or integrated programs and activities.	
1. This initiative involves a program or activity that provides a service (or services)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Those services are provided through: 1) a public body and at least one other public body or agency working collaboratively to provide that service; or 2) one public body working on behalf of one or more other public bodies or agencies	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. The common or integrated program or activity is confirmed by a written agreement that meets the requirements set out in section 12 of the FIPPA Regulation (link to the Regulation and read section 12)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you answered "yes" to all three questions, please contact the Information and Privacy Coordinator or Officer to discuss the requirements of a common or integrated program or activity.	

3 Collection, Use and Disclosure of Personal Information

3.1 Personal Information Flow Diagram / Table

3.1.1 Student Data Flow

Include a personal data flow diagram as well as completing the table below. The information in the example below illustrates how to complete the description. See Schedule B for a list of the seven privacy rules and use it to identify the appropriate rule and cite the appropriate legal authority.

Personal Information Flow Table			
	Description/Purpose of Activity	Privacy Rule	Authority
1.	<p>SFU sends demographic data and class roster from SFU's Systems of Record to Canvas@SFU to identify students and authorize use within Canvas@SFU</p> <p>Using external learning tools integrated within or that standalone from Canvas@SFU, SFU discloses student personal data to a service provider inside or outside Canada, who stores the data</p> <p>SFU discloses student personal data to employees when necessary to perform employment duties and they are temporarily travelling outside Canada</p> <p>SFU discloses student personal data to students who voluntarily access the learning management system from outside Canada</p> <p>SFU discloses the personal data obtained about students when they voluntarily use a social media identity and choose to use social media to be notified about events in a course</p>	Disclosure	<p>33.2(a), 33.2(c)</p> <p>33.1(1)(b), 33.2(c)</p> <p>33.1(1)(e)</p> <p>33.1(1)(b)</p> <p>33.1(1)(r), 33.1(7)</p>
2.	<p>Instructors engage academically with students for a teaching and learning purpose using external learning tools that are integrated within or standalone from Canvas@SFU. Students receive requests from instructors within or outside Canvas@SFU to submit assignments and other related course work. Instructors receive information from students within or outside Canvas@SFU related to course work</p> <p>Students express their personal views and voluntarily supply their photograph, non-email address and social media identity information within Canvas@SFU</p>	Collection	26(c), 27(1)
3.	<p>SFU combines demographic data originating from SFU Systems of Record with the students' course work in Canvas@SFU to allow instructors to engage academically with students for a teaching and learning purpose. Instructors use students' assignments and related course work to assess their academic performance and assign grades</p>	Use	32(a)

3.1.2 Instructor Data Flow

Include a personal data flow diagram as well as completing the table below. The information in the example below illustrates how to complete the description. See Schedule B for a list of the seven privacy rules and use it to identify the appropriate rule and cite the appropriate legal authority.


Personal Information Flow Table			
	Description/Purpose of Activity	Privacy Rule	Authority
1.	<p>SFU sends demographic data and class roster from SFU's Systems of Record to Canvas@SFU to identify instructors and authorize use within Canvas@SFU</p> <p>Using external learning tools integrated within or that standalone from Canvas@SFU, SFU discloses employee personal data to a service provider inside or outside Canada, who stores the data</p> <p>SFU discloses employee personal data to employees when necessary to perform employment duties and they are temporarily travelling outside Canada</p> <p>SFU discloses the personal data obtained about instructors when they voluntarily use a social media identity and choose to use social media to be notified about events in a course</p>	Disclosure	<p>33.2(a), 33.2(c)</p> <p>33.1(1)(b), 33.2(c)</p> <p>33.1(1)(e)</p> <p>33.1(1)(r), 33.1(7)</p>
2.	Instructors express their personal views, opinions about students' course work, and voluntarily supply their photograph, non-email address and social media identity information within Canvas@SFU	Collection	26(c), 27(1)
3.	SFU combines demographic data originating from SFU Systems of Record with information supplied by instructors in Canvas@SFU to allow instructors to engage academically with students for a teaching and learning purpose	Use	32(a)

3.2 Risk Mitigation Table

3.2.1 Risks to Student Data

Complete the table(s) below. In cases where the risks are substantially different for the individuals whose personal information is in SFU's custody or under its control, complete a table for each group. In cases where the risks are substantially similar or the same, complete only one table. The information in the example below illustrates how to complete the description. This is an example where the description could be consolidated in a single table but for the purpose of illustration is described separately.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

	Risk	Mitigation Strategy	Likelihood	Impact
1.	Same as above	Same as above	Same as above	

3.3 Collection Notice

In order to allow individuals the ability to exercise their information rights with knowledge of how their information will be used, they must be notified at or prior to the time of collection. Section 27(2) of the Act requires that the individual from whom personal information is collected be told: a) the purpose for collecting it, b) the legal authority for collecting it, and 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.

Describe below how and when notice will be given to individuals. Include the specific collection notices that will be used. Link to SFU's [collection notice templates](#).

3.3.1 Student Collection Notice

The following notices will be given to system users through the Central Authentication Service (CAS) page when logging in to Canvas@SFU. It will include a statement that by using the learning management system, users understand, accept and agree to the enumerated notifications and policies that are displayed or linked to.

Protection of Privacy

Protection of privacy rights and responsibilities at SFU is administered according to the provisions of BC's *Freedom of Information and Protection of Privacy Act* (the Act) and the University's Information Policies, published in its [Policy Gazette](#).

Personal Information Collection Notice

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. If employees have any questions about the collection and use of this information please contact the head of your department.

IT Services integrate learning tools within 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 are integrated within or standalone from their 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 within their Canvas@SFU courses.

Personal Information Access Notice

Authorized end users (i.e., faculty, students and administrators) can access the personal information within Canvas@SFU worldwide over the Internet.

SFU employees: Disclosure to you outside Canada is authorized only if necessary to perform employment duties when you are temporarily travelling outside Canada. In all other situations, access must be in Canada only.

Students: By voluntarily accessing the learning management system from outside Canada, you are deemed to give SFU your consent to disclose your personal information to you when outside Canada.

Personal Information Disclosure Notice

Student and employee personal information, collected and used through an External Learning Tool, is only disclosed to and stored by service providers inside or outside Canada when the tool passes the External Learning Tool Privacy Assessment Checklist.

When an External Learning Tool is used, it is strongly recommended that students enrolled in the course and employees instructing the course, read the “Terms of Use” and “Privacy Policy” for the tool prior to giving consent to disclose and store personal data inside or outside Canada using a service provider. Instructors must obtain students’ prior written consent in this situation using a standard form prescribed under the Act.

The University is permitted and exercises its right under Part 3 of BC’s *Freedom of Information and Protection of Privacy Act* to disclose the personal data obtained about students and instructors, who voluntarily use a social media identity and choose to use social media to be notified about events in a course.

3.3.2 Instructor (Employee) Collection Notice

Same as above.

4 Security of Personal Information

Describe below the specific measures that will be used to protect the personal information from unauthorized collection, access, use, disclosure, retention and disposal.

4.1 Physical Security Measures

[Redacted]

4.2 Technical Security Measures

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

- █ [Redacted]
- █ [Redacted]
- █ [Redacted]

4.3 Security Policies, Procedures and Standards

- █ [Redacted]
- █ [Redacted]
- █ [Redacted]
- █ [Redacted]
- █ [Redacted]
- █ [Redacted]
- █ [Redacted]

4.3.1 Information Classification Standard

(Note: this standard is under development – please leave this section blank). Using Information Technology Services’ standard for classifying the sensitivity, access restrictions and minimum-security requirements for information, identify the specific classification level that applies to this initiative.

4.4 Tracking Access / Access Controls

Describe the controls used to track access by authorized users of the personal information.

- █ [Redacted]

- [REDACTED]
- [REDACTED]

5 Accuracy, Correction and Retention of Personal Information

5.1 Updating and Correcting Personal Information

Describe here (if applicable) the procedure to allow individuals to routinely update or correct their personal information using regular channels (e.g., a student uses the SIS to update a home address or telephone number, an employee uses the HAP system to update emergency contact information, etc.).

In the absence of a routine process, this requirement would default to SFU's formal procedure [Requesting a Correction to Personal Information in University Records](#).

- Students use a self-serve update procedure in the student information system
- Instructors send requests for updates to Human Resources

5.2 Decisions That Directly Affect an Individual

Describe here (if applicable) how the information will be used to make decisions that directly affect an individual.

The information is used to make grading and assessment decisions that affect students in their academic progress.

5.3 Records Retention and Disposal

Cite the approved SFU Records Retention and Disposal Authority (RRSDA) that apply to the records series generated through this initiative. Link to SFU's [Directory of University Records](#) to determine if an approved RRSDA exists for these records.

If no approved RRSDA exists, describe how the records will be kept in the meantime. Note that if an individual's personal information is used by or on behalf of SFU to make a decision that directly affects the individual, SFU must retain the personal information for at least one year after being used. This is to ensure that the affected individual has a reasonable opportunity to obtain access to that personal information.

[RRSDA #1995-018 Examination Papers and Course Assignments](#)

[RRSDA #1999-002 Course Files](#)

6 Further Information

6.1 Systematic Disclosures of Personal Information

Describe here (if applicable) any usual disclosures inside the University between the office with primary responsibility for the personal information and other SFU departments and programs. Also describe any usual disclosures outside the University between SFU and another public or private body (e.g., provincial, territorial or federal government ministry, department or agency; university or college; transit authority; law enforcement agency).

If SFU and one or more other parties have signed an Information Sharing Agreement, include a copy with this completed PIA. An Information Sharing Agreement sets

conditions on the collection, use or disclosure of personal information by the parties to the agreement.

Usual disclosures are:

1. The student and employee personal data that flows to and from external learning tools and Canvas@SFU,
2. The exchange of grades between SFU's main Systems of Record in a system-to-system way (Canvas@SFU to SIMS), and
3. Students' academic work between employees who perform a teaching role, including under SFU's Teaching and Instruction Policy T 20.01 Grading and Reconsideration of Grades.

6.2 Access for Research or Statistical Purposes

Describe here (if applicable) any usual disclosures of the personal information made by your department for a research purpose, including statistical research, and how you comply with [section 35 of the Act](#).

Not applicable.

6.3 Personal Information Directory (PID) and Personal Information Banks (PIB)

The Personal Information Directory (PID) contains descriptions of the Personal Information Banks (PIBs) created and maintained by Simon Fraser University. A PIB is a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol or other particular assigned to an individual. PIB entries are added to the Directory as PIB records series are identified and scheduled.

Cite the PIB that apply to the records series generated through this initiative. Link to SFU's [Directory of University Records](#) and search the Personal Information Directory to determine if a PIB description exists for these records.

If no PIB description exists, create one below using the outline described in the [Personal Information Directory](#).

[Examination Papers and Course Assignments](#)

7 Coordinator of Information and Privacy Comments

7.1 Information or Materials Reviewed

The Coordinator will describe here any additional resources and authorities consulted when reviewing and commenting on the completed PIA.

I reviewed and considered:

1. SFU's Canvas implementation plan (published on the Canvas website),
2. Information and feedback regarding this PIA and the External Learning Tool Privacy Assessment Checklist, provided by Frances Atkinson (IT Services), Elaine Fairey (Library Public Services) and Chris Groeneboer (TLC), who are members of the Canvas Directors Team, with respect to how the LMS and learning tools function as well as the resources and procedures in place to support their implementation and use by instructors and students,

3. Information regarding the Pearson MyLab external learning tool, as an example of a standalone tool where student and employee personal data is collected and stored on servers inside Canada that are controlled by the service provider,
4. Feedback regarding the Checklist provided by: 1) Robyn Schell (TLC), who used it with Dugan O’Neil to assess the Pearson MyLab tool as a test case, and 2) the privacy managers at UBC and UVic,
5. Six requests for privacy advice made by Robyn Schell (TLC) with respect to what form student consent must take when instructors wish to disclose and store students’ personal information outside Canada. The cases involved using a cloud based version of the Canvas LMS (2), social media sites (2), cloud based external learning tools (3) and a plagiarism detection tool (1),
6. The information published on SFU’s Canvas website regarding contacts, support for instructors and students, implementation, and issues and updates,
7. BC’s *Freedom of Information and Protection of Privacy Act* [RSBC 1196] c. 165 and Regulation 155/2012,
8. *Cloud Computing Guidelines for Public Bodies*, Office of the Information and Privacy Commissioner for BC, June 2012, and
9. SFU’s [Directory of University Records](#) for relevant records retention schedules and personal information banks.

7.2 Conditions of Approval

The Coordinator will describe here any recommended conditions to be considered by the University officer with delegated decision-making authority under the Act, who approves the completed PIA.

Recommended conditions are:

1. The External Learning Tool Privacy Assessment Checklist (attached) is adopted as an integral part of this PIA. It is the key risk management tool enabling SFU to assess and document its compliance with legislated protection of privacy obligations when integrating diverse external learning tools within or that standalone from Canvas@SFU.
 - a. Use the checklist to assess all downloadable external tools and plug-ins to be made available within Canvas@SFU before adding them to the proposed browsable App centre.
2. The process described in this PIA involves no policing or enforcement on the part of TLC, ITS, CODE or Archives. It is a process in which instructors self-regulate. Therefore, the success of this approach depends on effective communication between and education of instructors, IT Services, TLC and CODE staff about the importance, value and collective responsibility (employees and institution) for completing the checklist **before** using an external learning tool. Educating users on a continuing basis is critically important to the success of this approach. The checklist is our only check and balance in this process because there is no approval mechanism. The process relies on trust that employees will use the checklist and only use tools that pass the checklist.
3. The preparation of a communication strategy describing what needs to be communicated, to whom, how and when:

- a. Topics include: 1) with support from the University, the instructor who is responsible for the course is responsible for the protection of privacy requirements under the law, 2) the privacy impact of using educational technology such as external learning tools, 3) using the External Learning Tool Privacy Assessment Checklist, and 4) how instructors can configure security settings when using an external learning tool and what to tell students.
 - b. Target audiences are: 1) instructors, 2) staff in IT Services, TLC, CODE and academic departments who are authorized users, and 3) students.
 - c. Multiple communication channels include: 1) the Canvas website, 2) TLC's Canvas workshops and one-on-one advisory service, 3) meetings with staff in units that fulfill a role in supporting Canvas, and 4) the notices provided to system users through the CAS page.
 - d. Timing: 1) starting in the spring semester and ongoing.
4. The personal information collection, access and disclosure notices are given to system users through the CAS page when logging in to Canvas@SFU. It include a statement that by using the learning management system, users understand, accept and agree to the enumerated notifications and policies that are displayed or linked to.
 5. The retention and disposal of records and information stored in the Canvas@SFU learning management system be scheduled in 2014-2015 to:
 - a. Manage the risk of unauthorized access, collection, use and disclosure of student personal information by keeping data longer than necessary with no continuing operational value, and
 - b. Identify records with continuing teaching, administrative and historical value to which access should be preserved.
- This project will require the participation of staff in Archives and Records Management, IT Services, TLC, CODE and the Vice President, Academic.
6. This PIA is reviewed in April 2015 to decide if any change is needed based on the experience gained using Canvas@SFU and external learning tools after fifteen months.
 7. A PIA is completed for any other LMS used by SFU (e.g., LON-CAPA).

8 Approval and Signatures

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

Jon Driver		
Vice-President, Academic and Provost	Signature	Date
Jay Black		
Chief Information Officer	Signature	Date
Bill Krane		
Special Advisor to the Vice-President Academic and Provost	Signature	Date
Ian Forsyth		
Coordinator of Information and Privacy	Signature	Date

Schedule A

Definition of terms

Access	Disclosure of personal information by the provision of access to personal information.
Anonymize	Present the results of a process in such a way that individuals whose personal information is contained in the records cannot be identified, and no linkages can be made between any personal information found in the records and personal information that is publicly available from other sources.
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.
Consistent purpose	<p>A use of personal information is consistent with the purpose for which the information was obtained or compiled if the use:</p> <ul style="list-style-type: none"> (a) has a reasonable and direct connection to that purpose, and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.
Contact information	Information that enables an individual at a place of business to be contacted; includes name, position title, business telephone number, business address, business email or business fax number of the individual.
Data linking	<p>The linking or combining of personal information in one source with personal information in one or more other sources if the purpose of the linking or combining is different from:</p> <ul style="list-style-type: none"> (a) the purpose for which the information in each database was originally obtained or compiled, and (b) every purpose that is consistent with each purpose referred to in paragraph (a).
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 the definitions for each of the latter terms).
Individual identifier	Information that would enable a third party to deduce the identity of the person concerned; examples include a person’s name, Social Insurance Number, student number, employee number, address, date of birth (usually used in combination with other identifiers).

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	Recorded information about an identifiable individual, other than business contact information, including but not limited to: <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.
Record	Includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records.
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.
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.

Schedule B

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Collection, Accuracy, Correction, Protection and Retention of Personal Information

Collection	Section 26	Purpose for which personal information may be collected <ul style="list-style-type: none"> • Prescribes the only situations in which SFU is permitted to collect personal information • Collect only the minimum personal information related directly to and necessary for the particular purpose
	Section 27	How personal information is to be collected <ul style="list-style-type: none"> • Prescribes that SFU must collect personal information directly from the individual the information is about except in very limited and specified circumstances • Prescribes when a collection notice is required and not required to be given to individuals
	Section 27.1	When personal information is not collected <ul style="list-style-type: none"> • Describes the situation when personal information is received by SFU but not collected
Accuracy	Section 28	Accuracy of personal information <ul style="list-style-type: none"> • Prescribes that SFU must make every reasonable effort to ensure that the personal information it uses is accurate and complete • Information collected by the University is often used to make a decision that directly affects the individual. Ensure this information is accurate because using out-dated information may result in serious consequences for the individual and the University
Correction	Section 29	Right to request correction of personal information <ul style="list-style-type: none"> • Prescribes how SFU must handle a request made by an individual to correct her or his information • Where factual errors in personal information are identified, the University is responsible for making the appropriate corrections upon request. If the incorrect information was made available to a third party, the University is responsible for providing the corrected information to that third party
Protection	Section 30	Prescribes that 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 media on which information is stored (paper or electronic records) must be considered when deciding what reasonable physical, technical and procedural security measures are necessary to adequately protect the personal information

Section 30.1 Storage and access must be in Canada

- Prescribes that 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

Retention Section 31 Retention of personal information

- Prescribes that SFU must ensure that personal information is retained for at least one year after being used so that the affected individual has a reasonable opportunity to obtain access to that personal information

Use and Disclosure of Personal Information

Use Section 32 Use of personal information

- Prescribes the only situations in which SFU may use the personal information it collects
- Consider the difference between “use” (within the University office that collected) and “disclosure” (making information available to anyone else inside or outside the University)

Disclosure Section 33 SFU may disclose personal information in its custody or under its control only as permitted under section 33.1, 33.2 or 33.3

- Describes the situations in which personal information may be released to another person. The circumstances under which personal information may be disclosed 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

Section 33.1 Disclosure inside or outside Canada

- Prescribes the only situations in which SFU may disclose personal information inside or outside Canada

Section 33.2 Disclosure inside Canada only

- Prescribes the situations in which SFU may disclose personal information inside Canada only

Section 33.3 Disclosure of personal information in records available to public without request

- Prescribes the situation when SFU may disclose to the public a record that is within a category of records established under section 71(1)

Section 35 Disclosure for research or statistical purpose

- Prescribes the situation when SFU may disclose personal information in its custody or under its control for a research purpose, including statistical research

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SIMS	Student Information Management System (Registrar’s primary undergraduate and graduate student information system)
SERA	Student Enrolment, Retention, Advancement (Lifelong Learning’s student information system for continuing education students)
AMAIN	Account Maintenance. (The system of record for Computing Accounts. It compiles information from other systems of record which is then fed to downstream systems)