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Use this privacy impact assessment (PIA) update template when making a small number of significant changes to an existing initiative involving the processing of Personal Information by KPU or a Third Party contracted by KPU. A University Initiative includes any activity or commitment undertaken by a University Employee in the performance of their duties that involves collection or processing of Personal Information. It may be, among other things, a program, service, or activity of the University, including the use or purchase of a technological solution or software for University activities (irrespective of the dollar value of the initiative).

Talk to the Privacy Officer supporting the PIA update to determine whether this form is appropriate or whether there are enough significant changes to warrant using the original PIA Questionnaire to update the PIA.

Do not leave any answers blank. Answer N/A to the open-ended questions that are not relevant to the changes being made to the Initiative.

Please read through this form before starting to populate it in order to ensure information is recorded in the correct sections.

Please note that some information recorded in the PIA may be confidential or proprietary and not intended for distribution. Before you share the draft or completed PIA (internally or externally), please contact KPU's privacy office at privacy@kpu.ca for guidance or instructions.

**PART 1: GENERAL INFORMATION**

Initiative title:	Turnitin Draft Coach Submission Processing Update
Original PIA title:	Turnitin Draft Coach
Original PIA number:	PIA 2022-040
Department or Faculty ("Business Unit"):	Teaching and Learning Commons
Initiative Lead (PIA drafter):	Mustafa Mohammed – Manager, Learning Technology Systems Operations
Initiative Lead email:	Mustafa.mohammed@kpu.ca
One-over-One Name and Title:	Leeann Waddington – Associate Vice President, Teaching and Learning
One-over-One email:	Leeann.waddington@kpu.ca
Privacy Officer name:	Adam Cullum – Manager, Records and Information Management
Privacy Officer email:	Adam.cullum@kpu.ca
If initiative involves a Third Party (i.e. vendor, consultant, partner), provide:	
1. Third Party name	Turnitin
2. Product name (if applicable)	Turnitin Draft Coach (part of Turnitin Feedback Studio)
3. Third Party contact name and email	
4. Third Party URL	https://www.turnitin.com

1. What is the update to the initiative? Summarize the changes, how the changes enhance or improve the initiative, and who is involved.

Through discussions with the vendor, the vendor revealed that

s. 21(1)



2. Are there new or different activities being introduced into the initiative?

☒ Yes
☐ No

3. If the answer to Question 2 is yes, describe the new or different activities

As indicated in Turnitin's Privacy Policy they may retain information for any use related to their services and may keep the information as long as legally permissible for these purposes.

s. 21(1),
s. 13

Privacy Officer Note:

4. Are there new or different data or information elements involved in the initiative?

☐ Yes
☒ No

5. If the answer to Question 4 is yes, describe the new or different data or information elements.

N/A

6. Did you list Personal Information in Question 5? Personal Information is any recorded information about an identifiable individual, other than business contact information. Personal Information includes information that can be used to identify an individual through association or reference.

☐ Yes
☒ No

Privacy Officer Note: While there isn't any new or different information being managed in this initiative, how the information is being managed means it is no longer consider transitory management of the records, but becomes disclosure for storage of student submissions. This itself prompts a PIA update even though the answer above is No.

7. Has there been a change to the terms of the Agreement that governs the relationship between KPU and the Third Party?

☐ Yes
☒ No

8. If the answer to Question 7 is "Yes", please summarize the changes to the terms of the Agreement. Provide the Privacy Office with a copy of the Agreement showing the changes summarized.

N/A



If the answer to Question 6 is "No", submit Part 1 to the Privacy Office, along with Part 5 Signatures.

PART 2: ASSESSMENT FOR DISCLOSURE OUTSIDE OF CANADA

9. Did you list Sensitive Personal Information in Question 5? (Any Personal Information can be Sensitive Personal Information in different contexts. Please contact the Privacy Office to discuss.)

- ☐ Yes
☒ No

Privacy Officer Note:

s. 15(l), s. 13

s. 15(l)

s. 15(l)

Name of Third Party	Name of cloud infrastructure and/or platform provider(s) (if applicable)	
Turnitin Corporate Servers		



12. Describe the privacy risks for disclosure of Sensitive Personal Information outside of Canada.

Type N/A in the cells on the first row if Sensitive Personal Information is not stored outside of Canada as indicated in Question 10.

Use the table to indicate the privacy risks. For each privacy risk you identify, describe the potential impact to individuals or KPU, and describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the Sensitive Personal Information (contractual, physical, technical, administrative measures) you outline elsewhere in this PIA.

Privacy risks below are examples only; add new rows if necessary.

s. 15(1), s. 13

Privacy risk	Impact to individuals or KPU (or KPU employees)	Risk response

PART 3: INFORMATION MANAGEMENT CHANGES

13. Complete the Changes to the Information Flow Table

Use column 1 to describe the differences between the way Personal Information moves through your initiative at each relevant step. Describe the changes to the steps as if you were explaining it to someone who does not know about your initiative. Reference the step that is being changed, or reference the point where steps are being added or removed to allow the Privacy Office to see the comparison between the information management steps in the original PIA and the proposed changes.

Use column 2 to identify whether the information management step has been revised, added or removed.

Use column 3 to indicate whether the information management step in column 1 is a collection, use or disclosure of Personal Information.

The Privacy Officer will complete column 4 to identify the legal authority for the revised, added or removed collection, use or disclosure.

If there are no changes to the Information Flow mark the first row with N/A

Information Management Steps	Added, removed or revised	Collection, use or disclosure	FIPPA and other legal authorities
	Revised	Collection / Use	26(d), 32(b)
	Revised	Use	32(b)
	Revised	Disclosure	33(2)(c), 33(2)(v)

s. 15(l)
s. 21(1)

14. Complete the table that reviews the proposed changes to storage, security, accuracy, correction and retention of Personal Information.

Use column 2 to briefly describe the differences between the way Personal Information is managed in your initiative in each category listed in column 1. Briefly describe the changes as if explaining it to someone who does not know about your initiative.

The Privacy Office will complete column 3 to cite the legal authority inside and/or outside of FIPPA support the proposed changes to information management in the Initiative.

Mark N/A in each row that does not have any changes proposed for this Initiative. Create another row if there is more than one change to an information management category listed in the first column.

Information Management Categories	Brief description of the change	FIPPA and/or other legal authorities
Storage	Disclosure of entire student submission and associated identity data for storage outside of Canada	33(2)(c)
Physical Security	N/A	
Technical Security	N/A	
Accuracy	N/A	
Correction	N/A	
Retention and Disposal	Indeterminate period of retention of student submission for Turnitin's quality improvement purposes.	31

PART 4: PERSONAL INFORMATION BANKS

Provide information about whether changes to the initiative will generate a new or different Personal Information Bank.

15. Will your initiative result in a new or revised Personal Information Bank ("PIB")? A PIB is a collection of Personal Information searchable by name or unique identifier. If a new PIB will be generated, please complete the table below. If more than one new PIB will result, copy and paste an additional copy of the table below and fill out a separate table for each PIB. If a revised PIB will be generated, copy and paste the fields and highlight the changes that are occurring.

- ☐ Yes
☒ No

Title	
Location	
Personal Information Types	
Categories of Individuals Included	
Collection Authority	
Purpose of Personal Information	
Categories of Persons Managing Information	



PART 5: SIGNATURES

Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Office as of the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Adam Cullum – Manager, Records and Information Management	As per email chain	June 13, 2022

Stakeholder Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way Personal Information is collected, used, stored or disclosed, the Business Unit will engage with the Privacy Office and if necessary, complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

INITIATIVE LEAD (PIA Drafter)

Name and Title	Signature	Date signed
Mustafa Mohammed – Manager, Learning Technology Systems Operations		2023/06/13

s. 22

Declaration of Initiative Lead: I confirm that I understand the privacy impacts of this University Initiative and am committed to my FIPPA obligations set out herein relative to the collection and management of Personal Information involved in the initiative. If there are any changes to the initiative, including to the way Personal Information is collected, used, stored or disclosed, I understand that the Business Unit will need to engage with the Privacy Office and if necessary, complete a PIA update. I will establish business practices and processes for proper collection and management of Personal Information and ensure these are documented and followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related University policies and procedures; and KPU Privacy Advice, Guidance, and Guidelines relative to this initiative.

ONE-OVER-ONE SIGNATURE

Name and Title	Signature	Date signed
Leeann Waddington – Associate Vice President, Teaching and Learning	See Information Technology	June 15, 2023

Declaration of Dean/Director: I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the Business Unit by providing required resources to comply with FIPPA and related University policies and procedures; and KPU Privacy Advice, Guidance, and Guidelines relative to this initiative.

**INFORMATION SECURITY**

Required only when University Initiative involves Information Security.

Name and Title	Signature	Date signed
No substantial change to IT Security	N/A	N/A

Declaration of Information Security: I confirm that I am satisfied that the Information Security safeguards employed in this University Initiative meet reasonable requirements commensurate with the amount or sensitivity of the Personal Information or KPU business information described in this PIA.

INFORMATION TECHNOLOGY

Required when University Initiative involves use of KPU IT systems (including Teaching and Learning or Library) or integration of Third Party technology with KPU IT systems.

Name and Title	Signature	Date signed
Leeann Waddington, AVP, Teaching & Learning		June 15, 2023

s. 22

Declaration of Information Technology: I confirm that I understand and approve of the proposed use-case of KPU IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with KPU's IT systems for the University Initiative described in this PIA, where applicable.

HEAD OF THE PUBLIC BODY OR DESIGNATE UNDER FIPPA

Required only if Personal Information is involved in the initiative as indicated in Question 6.

Name and Title	Signature	Date signed
Diane Purvey – Provost and Vice-President Academic		June 14, 2023

s. 22

Declaration of Head of Public Body or Designate: I affirm that I have reviewed this PIA and accept the residual privacy risks identified for this University Initiative. I am satisfied that this PIA has been completed in accordance with FIPPA.