

Privacy Impact Assessment: TurnItIn Software

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1. Description of the Initiative

BCNET is taking the lead on the development of this Privacy Impact Assessment (PIA) for use of the TurnItIn Feedback Studio (TII) online writing and student work evaluation tool on behalf of its members and affiliations.

BCNET is a federally incorporated not-for profit services and information technology organization that represents the interests of its member institutions (to include 25 publicly funded) made up of universities, colleges, institutes, and research organizations across British Columbia. It represents all public, post-secondary education institutions in the province and provides shared services to its members in the areas of networks, procurements, licensing, and IT services.

This unique, collaborative shared services model provides a multitude of benefits to its members from reducing and containing costs and increasing spending power, to decreasing duplication and improving service quality and productivity. The model cultivates a strong community, where members actively engage with peers to share, explore, and develop innovative ideas and solutions as they tackle a broad spectrum of common and unique research and education technology challenges and topics. BCNET strives to add value to its membership by leveraging an advanced network that provides economies of scale to maximize efficiencies and drive down collective costs, while at the same time, continuing to facilitate collaborative innovative solutions that meet the needs of their stakeholders in support of world-class research and education.

TurnItIn Feedback Studio (TII) offers a suite of web-based online writing and student work evaluation tools (SaaS) used by universities around the world. TII merges originality checking, online grading, and peer review into a single service.

As the world's most effective solution in the detection of unoriginal content, TII checks student and researcher papers for originality, provides digital grading tools, and streamlines web-based peer reviews.

TII compares documents submitted by students/researcher against its database; the world's largest collection of internet, academic, and student paper content, with the aim of identifying potential academic misconduct. In deploying TII, BCNET members not only protect and promote the academic integrity of their institution's curriculum and reputation, but they also support the academic behaviour and integrity of their students. With TII, instructors effectively manage their student's assignments and submissions, and provide personalized feedback and grade student work.

Key features of BCNET's subscription with TII Feedback Studio:

- Originality Checking: - Used for students to screen their work for improper citation or potential plagiarism. TII identifies how much of the student's work matches up with text found in its database and the other internet resources available. It highlights words that are similar and/or copied and provides the student and the teacher a score based on how much of the work is identified as original. In addition, it provides the teacher with an intuitive "Similarity Report", that provides text matches from specific sources and an indicative percentage similarity score.
- Automatic spelling/grammar checker: - automatically checks and highlights submissions for grammar, usage, punctuation, vocabulary, sentence structure, style, and spelling errors etc.
- Smarter Grading/Feedback: - Used for on and offline grading, and faster and more comprehensive feedback. Instructors can drag and drop standard (QuickMarks – reusable comments), or customized comments directly onto the student's paper and/or leave voice comments to provide meaningful assignment feedback. Pre-defined or custom rubrics help instructors consistently evaluate student work and easily connect grading criteria to in-line feedback.
- Streamline Peer Review – PeerMark is a TII peer review assignment tool. Instructors can create and manage assignments that allow students to read, review, and evaluate one or many papers submitted by their classmates. Instructors can choose whether the reviews are anonymous or attributed. Basic steps of the peer review process:
 - Instructor creates a Turnitin paper assignment.
 - Instructor creates an assignment and sets the number of papers students will be required to review and creates free response and scale questions for students to respond to while reviewing papers.
 - Student papers are submitted to the Turnitin assignment.
 - On the assigned assignment start date, students begin writing peer reviews.
 - For each assigned paper students write reviews by responding to the free response and scale questions.
 - Students receive reviews as other students complete them.
 - Once the assignment due date passes no more reviews can be written, completed, or edited by the writer

TII supports BCNET and its members in upholding their ongoing commitment to educational excellence by providing data driven insights that:

- Confirms students are doing their own work;
- Alerts them to potential academic misconduct;
- Ensures fair marking of submissions

This promotes BCNET member academic integrity, increases instructor efficiency and effectiveness and elevates academic and institutional success. TII helps instructors teach students how to work with source information, improve their writing skills and avoid plagiarism. It also empowers them to think critically, take ownership of their work and fosters authentic writing and long-term academic integrity practices.

As a web-based SaaS, “in the cloud” and dependent on how it has been configured, BCNET member instructors and students access their accounts by logging directly into the service at (turnitin.com), TII via their institutions SAML single sign on process, or by utilizing the CANARIE Canadian Access Federation (CAF) Federated Identity Management (FIM) process. TII is interoperable, integrates with all major Learning Management Systems (LMS) and access is currently supported across the following BCNET member institutions using Blackboard Learn, Canvas, Brightspace (Desire2Learn), and Moodle. Each institution will have the ability to select and manage their preferred sign in methodology.

To use TII information from the BCNET member’s LMS is transferred to TII. BCNET members currently use integration brokers (or interface engines) specific to their institution to move the data securely from their LMS into TII. The information that is transferred is limited to what is required to use the services in the TII application. Updates made in BCNET member institution LMS’s (e.g. class enrollment ID’s etc.) are sent by the integration broker to TII over SSL in real time.

TII is a U.S. based company headquartered out of Oakland, California in the U.S. TII controls and operates the site from the U.S. on behalf of BCNET and its members as users of the service. TII’s software is hosted on AWS servers in Canada, a global solutions provider with a demonstrated track record in providing enterprise-grade security, scalability, administrative safeguards, and data protection protocols for industry-leading video conferencing solutions. A comprehensive PIA has been completed by BCNET on AWS. This PIA covers the full spectrum of AWS services and their operational controls and measures deployed in the Canadian Cloud environment to identify and assess potential vulnerabilities to BCNET members.

Previously the data in TII was hosted internally in TII data centres located in Sacramento, California, U.S. (primary) and Santa Clara, California, U.S. (secondary). In selecting AWS as its’ cloud infrastructure service provider, services previously hosted on TII internal servers will now be hosted on AWS servers located in the Quebec, AWS Canadian region, ensuring the data continues to reside within Canada. In selecting AWS as its cloud service provider, TII supports and accelerates its innovation by leveraging built-in AWS services. AWS’s reliability, security, and availability allows TII to continue to provide a high level of service and end-to-end security on a trusted global infrastructure to BCNET members.

2. Scope of this PIA

This Privacy Impact Assessment (PIA) addresses the collection, use, disclosure, storage, access, and security of personal information while using the TII application. In order to meet privacy requirements,

BCNET works collaboratively with their IT department and TII for ongoing maintenance and upgrades to the platform.

This PIA also covers the privacy and security measures and operational controls deployed by both TII and AWS as it relates to Privacy, Security and Data Protection in British Columbia.

3. Related Privacy Impact Assessments

No other PIA's have been completed on TII; however, a comprehensive PIA has been completed by BCNET on Amazon Web Services (AWS). This PIA covers the full spectrum of AWS services and its operational controls and measures (to include disaster recovery) deployed in the Canadian Cloud environment to identify and assess potential vulnerabilities to BCNET members and the community at large.

This PIA reflects the current status of the TII application and will be updated/revised to ensure that any future privacy issues identified related to the collection, use, disclosure, storage, access, and security of personal information is captured, addressed, and reflected in this document, as necessary.

4. Elements of Information or Data

Full name
Organizational defined enrollment ID/Username (user's LMS ID/password)
Student number (if not the same as above)
Email address
Password
Course registration
Class ID
Student work submissions and products

5. Storage or Access outside Canada

TII is a U.S. company that hosts its TII Feedback Studio application (TII) on AWS data centres in Canada to store their data in the cloud. Data is not stored or accessed outside of AWS servers in Canada. At no time does TII or AWS have direct access to data that is being processed unless it is at the request of a BCNET client. TII data is stored nightly on encrypted hard drives on a server located in a Canadian data centre in Quebec.

TII retains control and ownership of the content and it is their responsibility to manage their data backup plans. Canadian data is backed up in AWS Canadian servers.

AWS:

Please refer to the AWS PIA for further detailed information related to this section.

In deploying TII, BCNET and its member institutions will be using the AWS servers in the Canadian cloud for both data in transit and data at rest. Assessment of this platform, including disaster recovery options, is outlined in the BCNET Amazon Web Services (AWS) Canada Privacy Impact Assessment.

6. Data-linking Initiative*

In FOIPPA, "data linking" and "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 and you must comply with specific requirements under the Act related to data-linking initiatives.

1. Personal information from one database is linked or combined with personal information from another database;	Yes
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	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.	N/A
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	

7. Common or Integrated Program or Activity*

In FOIPPA, "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 of these 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);	Yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	No
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

8. Personal Information Flow Diagram and/or Personal Information Flow Table

BCNET members that have deployed the TII Feedback Studio (TII) assume responsibility and management of their LMS within their ERP operating systems (including updates and security patches), other associated application software, configuration of the TII provided security group firewalls, and other security, change management, and logging features.

This table addresses the flow of personal information between BCNET members and TII (students and instructors).

Personal Information Flow Table – Users			
	Description/Purpose	Type	FOIPPA Authority
	Student and faculty personal information is collected in the BCNET member ERP (e.g. at time of student registration or faculty course assignment)	Collection	26(c)
	The BCNET member LMS transfers personal information from the ERP for use in courses and assignments through the member specific integration broker.	Use	32(a)
	TII application receives personal information from the BCNET member specific LMS to facilitate the use of TII services. (the information that is transferred is limited to what is necessary to use the TII services)	Use	32(a)
	Students and faculty access TII via a secure connection using their ID and password. (either directly at turnitit.com or via their LMS)	Use	32(a)
	Authentication is performed by the BCNET member single sign-on log-in system.	Use	32(a)
	Students' assignments, work products and reviews are submitted through TII by the students and/or faculty.	Use	32(a)
	Faculty reviews submissions, provide feedback and grade student submissions in TII.	Use	32(a)

9. Risk Mitigation Table

It should be noted that primary responsibility for the management and administration of any physical and/or technical security risks is born by any BCNET member choosing to deploy TII services. These privacy risks are managed through a combination of technical, administrative, and physical controls that are designed and in place to mitigate each associated risk.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized individuals could access the personal information in the TII application and use or disclose it for personal purposes (within BCNET member specific institutions).		Low	High

2.	Unauthorized individuals/service providers could access the personal information in the TII application and use or disclose it for personal purposes (within TII or AWS)		Low	High
3.	TII user account is accessed externally by another individual.		Low	High
4.	Personal information is compromised when transmitted and stored in TII AWS servers.		Low	High
5.	Third-party security breach.		Low	High

10. Collection Notice

BCNET members are responsible for ensuring the appropriate collection notification is in place prior to the collection of personal information and before transmission into the TII application.

11. Please describe the physical security measures related to the initiative (if applicable).

BCNET:

BCNET members are responsible at all times for ensuring the physical security of all data while in their custody and/or control (including all data at rest or in transit) and must meet all applicable physical security standards required by their organization. Although they may vary from institution to institution it typically includes the following:

AWS:

Please refer to the AWS PIA for further detailed information related to this section.

12. Please describe the technical security measures related to the initiative (if applicable).

BCNET:

BCNET members are responsible at all times for ensuring the technical security of all data while in their custody and/or control (including all data at rest or in transit) and must meet all applicable technical security standards required by their organization. Although they may vary from institution to institution it typically includes: Data in the ERP is stored in a database located behind corporate firewalls that block all connections to the database from the internet. The integration broker is used as an intermediary between TII and the member specific LMS data. Access to this server is restricted via an access control list on the [REDACTED] When information is ready for delivery to TII it is sent through an SSL connection.

TII:

is responsible at all times for ensuring the technical security of all customer data while in their custody and/or control (including all data at rest or in transit) and must meet all internal technical security standards as well as those required under contract by the BCNET member.

- [REDACTED]

NETWORK SECURITY MEASURES:

- [REDACTED]

REDUNDANCY AND SCALABILITY:

The service is highly scalable and redundant, allowing for fluctuation in demand and expansion of users while greatly reducing the threat of long-term outages. Load-balanced networks, pools of application servers, and clustered databases are features of its design.

DISASTER RECOVERY:

All customer data is stored in secure data centers and is replicated over secure links to a disaster recovery data center. This design provides the ability to rapidly restore the service in the case of a catastrophic loss2

CUSTOMER-CONTROLLED PRIVACY AND SECURITY SETTINGS:

- Customers may determine which of their respective designees can access different categories of data.

AWS:

Please refer to the AWS PIA for further detailed information related to this section.

13. Does your branch/department rely on any security policies?

BCNET:

BCNET members are responsible for the deployment, dissemination and administration of all organizational security policies etc. as it relates to the handling and management of personal information in their custody and/or control. Although they may vary from institution to institution, they typically include the following standard policies:

- Acceptable Use of Information Technology
- Information Security
- Safety, Security and Emergency Management

TII:

TII is responsible for the deployment, dissemination and administration of their own internal organizational security policies etc. as it relates to the handling and management of personal information in their custody and/or control as well as those required under contract by the BCNET member.

https://help.turnitin.com/Privacy_and_Security/Privacy_and_Security.htm?_ga=2.119973704.1308901042.1588102350-1394894806.1587074243&_gac=1.86702826.1587404228.CjwKCAjwkPX0BRBKEiwA7THxiIGRp-gm-R97BRIdW5qEoTWm49AxWQdIiR-he0BoEqKhJKUV9r3leixoCbJoQAvD_BwE

AWS:

Please refer to the AWS PIA for further detailed information related to this section.

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

BCNET:

BCNET members are responsible for the strict management and administration of user access based on a "need to know" basis only, including maintenance and enforcement.

Access to the TII application by faculty and staff is granted based on individual roles and responsibilities by member account administrators. Students and faculty have unique user IDs and passwords and self-manage changes

TII:

At the highest level, authorized server administrators have log reports that document all server contacts (hits). These logs are very detailed and require a specific level of knowledge to interpret them. Application administrators have access to these logs through a formal request process. These logs are used by system administrators to triage and troubleshoot technical problems and could be used in cases of BCNET member investigations into any breach of system security that may occur, or

in cases of investigations related to academic misconduct or academic appeals. These reports do not include detailed personal information but can be used to identify user activity starting with a user's log-in to the system.

In addition, TII has access to personal information for the purposes of implementing, maintaining, repairing, troubleshooting or upgrading the BCNET member application as authorized by BCNET and as permitted under Section 33.1 (1)(p) of the Act.

AWS - cannot access or alter personal information in any way.

15. Please describe how you track who has access to the personal information.

BCNET:

BCNET members and their service providers are responsible for ensuring that access to all personal information in their custody and/or control is controlled, monitored, and reviewed/audited on a regular basis.

TII:

Has an annually updated SoD policy controlled by the CISO.

AWS:

AWS does not have access to TII (BCNET member) personal data. Please refer to the AWS PIA for further detailed information related to this section.

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

The BCNET member LMS is automatically updated from their ERP. The ERP is the authoritative source for all user data in the LMS. Approved changes made in the ERP automatically populate to the LMS in real time or nightly batch transfer.

Under no circumstances do TII or AWS alter personal information in any way.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

Yes, student work product is reviewed and evaluated in TII. Marks and feedback are retained in TII and final course grades are manually entered into the BCNET member ERP. Should a student fail a course, the individual assignment and test marks are also logged into the ERP.

18. If you answered "yes" to question 18, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

Each BCNET Member's faculty and students are responsible for the accuracy and completeness of the information.

19. If you answered “yes” to question 17, do you have records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

Each member institution is responsible for their Records Management retention schedule and related policies.

TII: Log data identified in point 14 is maintained indefinitely. Student work product is not maintained as a whole work product, however unique grammar and phrases are maintained without any associated PII.

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

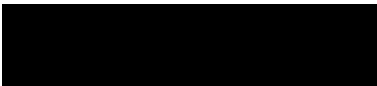
No

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

Yes.

- a. TurnItIn Feedback Studio (TII) application.
- b. Registration through TII includes all personal information as outlined in section 4 (pg. 4) above, - elements of information or data.
- c. Section 26(c)
- d. Obtained, compiled and used for the implementation and deployment of the TII application.
- e. Used by authorized BCNET staff, BCNET member specific students and faculty in support of implementation and deployment of the TII application.

Signed on Behalf of BCNET:



Dean Crawford
Director, Shared Systems and Technology
BCNET

07 December, 2020

Date