Bluenotes GLOBAL 2019

CONFERENCE

BCIT's Privacy Impact Assessment for Blue
A Not So Laid-Back Experience, EH?

WELCOME!

Presenter

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- Instructor

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- Instructional Assessment Online Project Lead

Agenda

- Where Instructional Assessment Online Began

- The Problem and Solution

- Project

- Privacy Impact Assessment

  - Level of Knowledge (research)

  - Considerations

  - Process

  - Challenges and Benefits

Where IT Began . . .

- British Columbia Institute of Technology (BCIT) has processed over 60,000 paper-based instructional assessment surveys, completed by students at the end of their courses
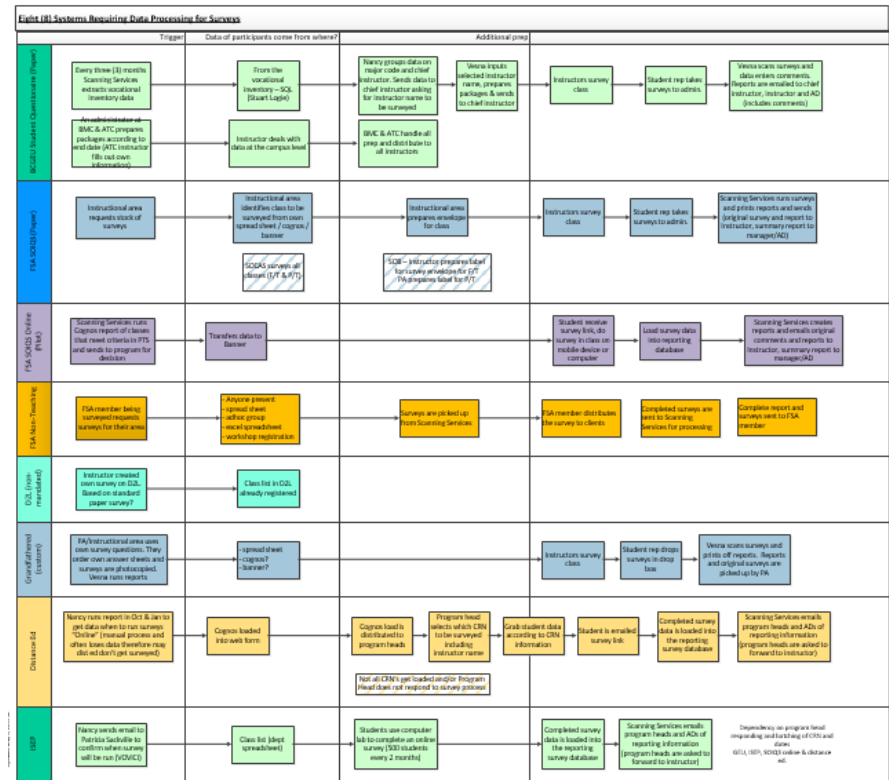
Overall Feedback. . .

The Solution . . .

- Externally hosted solution was sound decision
  - only option that was feasible given the resources and time to implement
  - externally hosted and cloud-based technology
  - industry norm.

Project Scope and Considerations. . .

- Internal versus External hosting

- Privacy Policies

- Sponsorship

- Political sensitivity

  - Accuracy of data

  - Bargaining units

  - Value of surveys

  - Sending the correct message

Project Deliverables

- Requirements doc.

- Install and integrated with BCIT's single sign on (SSO)

- Communication plan (incl. MarCom, SA, Faculty, Management, etc.)

- Phased implementation of eXplorance Blue

- Training (ongoing)

Let's Talk About

BETTER FOR INSTRUCTORS.
BETTER FOR STUDENTS.

Instructional questionnaires are going online.

BCIT

STOP!!!

Security & Privacy of Data

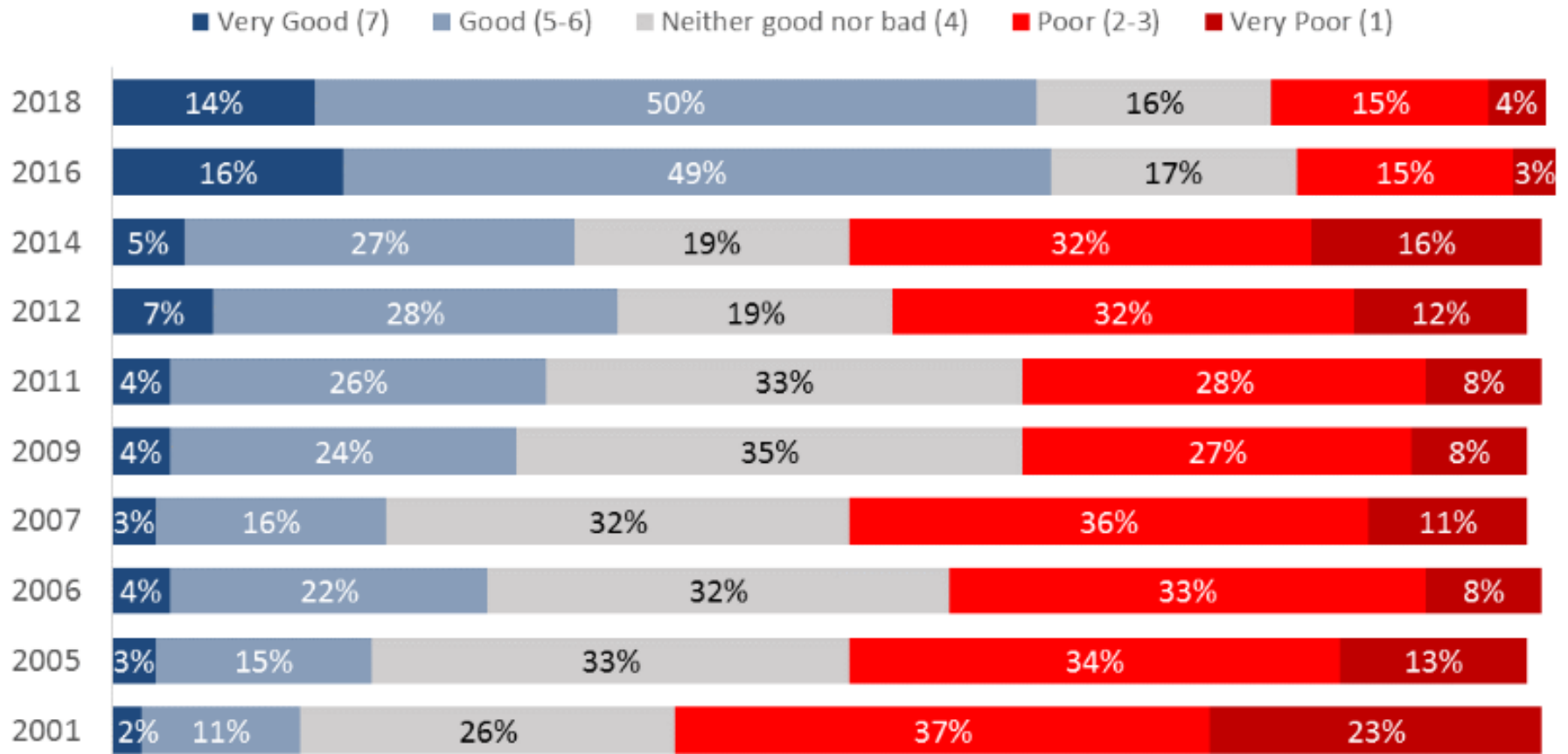# Data Protection . . .

Hosting Server Locations

Privacy Impact Assessment (PIA) . . .

- In Canada, there are two main information privacy laws:

Level of Knowledge of Privacy Rights . . .

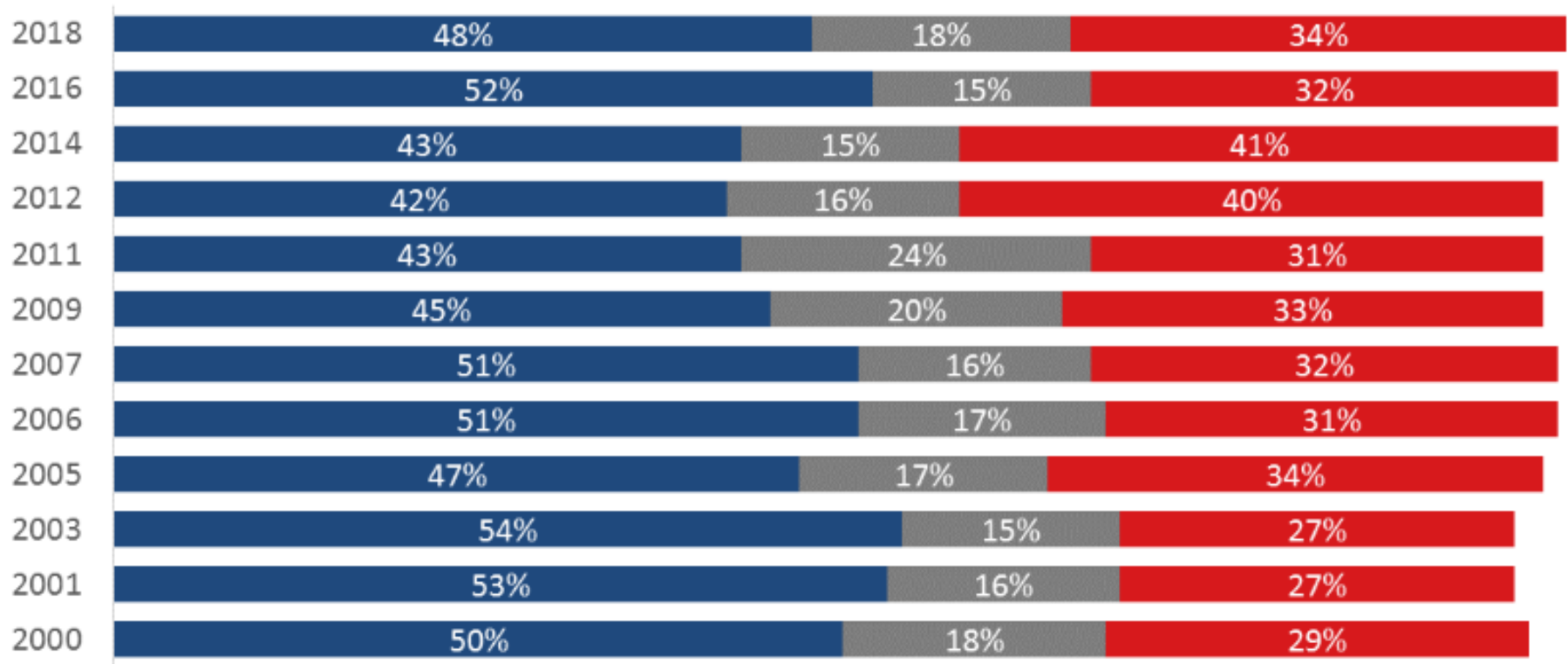Q: How would you rate your knowledge of your privacy rights (n=1,516)

Legend: ■ Very Good (7) ■ Good (5-6) ■ Neither good nor bad (4) ■ Poor (2-3) ■ Very Poor (1)

Year	Very Good (7)	Good (5-6)	Neither good nor bad (4)	Poor (2-3)	Very Poor (1)
2018	14%	50%	16%	15%	4%
2016	16%	49%	17%	15%	3%
2014	5%	27%	19%	32%	16%
2012	7%	28%	19%	32%	12%
2011	4%	26%	33%	28%	8%
2009	4%	24%	35%	27%	8%
2007	3%	16%	32%	36%	11%
2006	4%	22%	32%	33%	8%
2005	3%	15%	33%	34%	13%
2001	2%	11%	26%	37%	23%

Office of the Privacy Commissioner of Canada (2018)

Level of Knowledge of Privacy Rights . . .

"I am confident that I have enough information to know how new technologies might affect my personal privacy." (n=1,516)

■ Agree (5-7) ■ Neutral (4) ■ Disagree (1-3)

Year	Agree (5-7)	Neutral (4)	Disagree (1-3)
2018	48%	18%	34%
2016	52%	15%	32%
2014	43%	15%	41%
2012	42%	16%	40%
2011	43%	24%	31%
2009	45%	20%	33%
2007	51%	16%	32%
2006	51%	17%	31%
2005	47%	17%	34%
2003	54%	15%	27%
2001	53%	16%	27%
2000	50%	18%	29%

Office of the Privacy Commissioner of Canada (2018)

Level of Knowledge of Privacy Rights . . .

Knowledge and Concern by Age

Office of the Privacy Commissioner of Canada (2014)
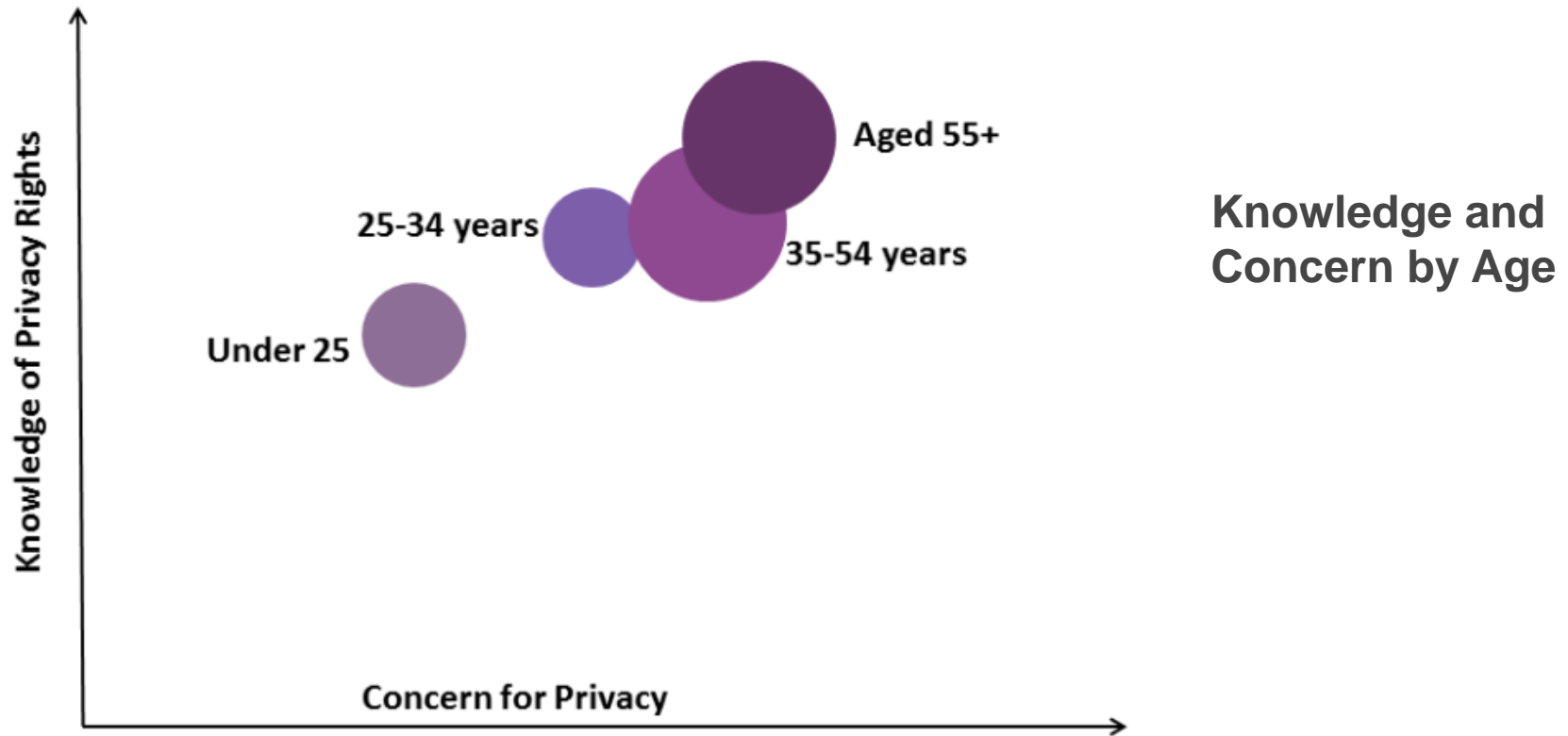
Level of Knowledge of Privacy Rights . . .

Education

Knowledge and Concern by Education
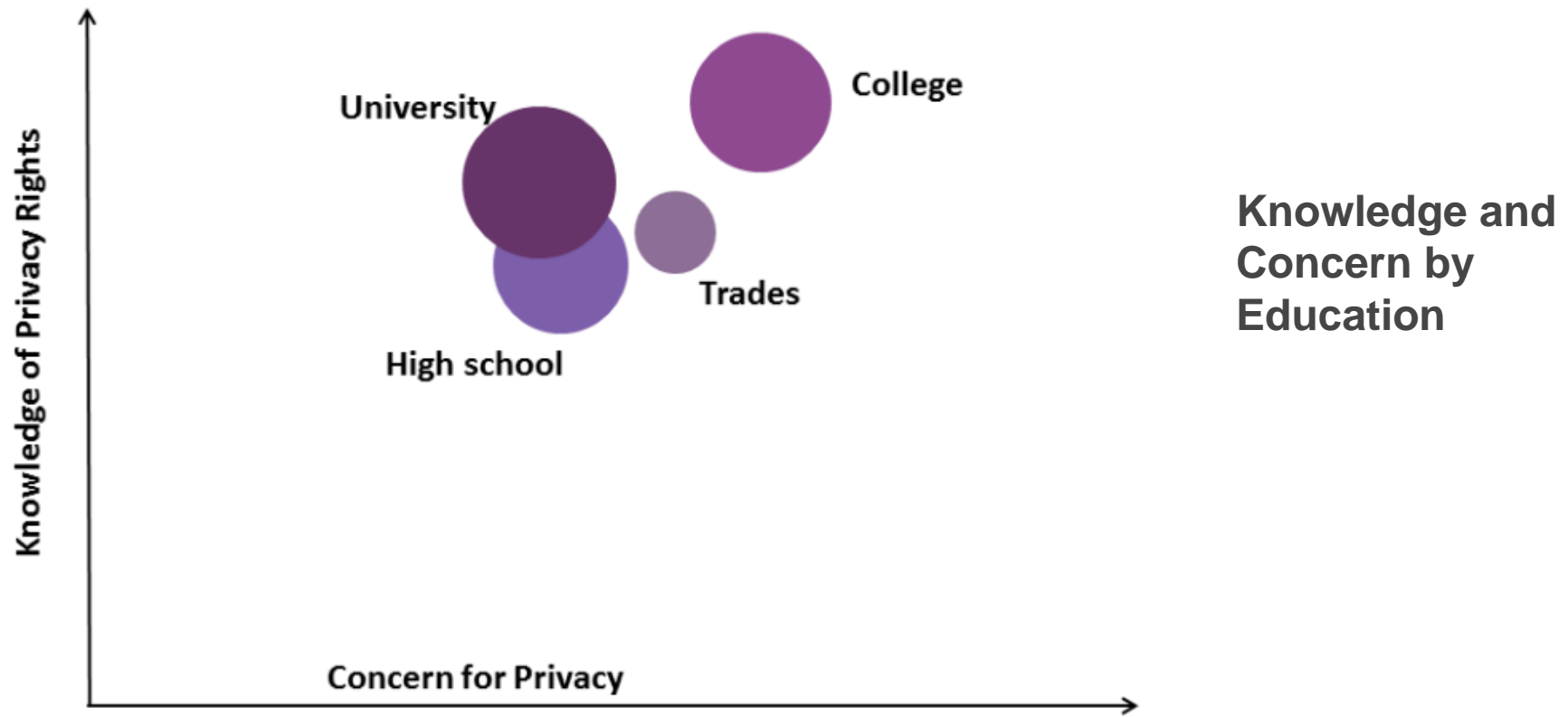
Office of the Privacy Commissioner of Canada (2014)

Level of Knowledge of Privacy Rights . . .

Q: In your opinion, who should be responsible for helping you protect your personal information? (n=1,516)

- Companies — 25%
- Government — 67%
- Don't know — 6%

Office of the Privacy Commissioner of Canada (2018)
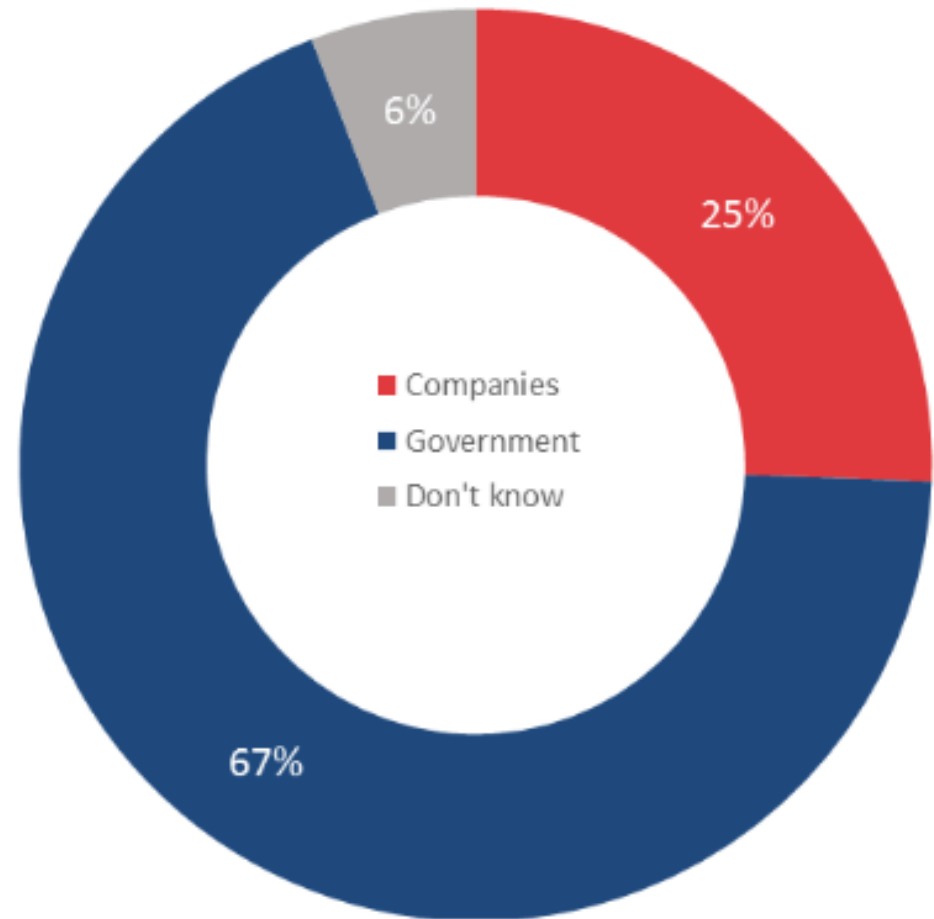
Our Practice Was . . .

- Internal Systems
  - No issues
  - Retention schedules
- External Hosting
  - FTP (gold standard)
    - Personal information
    - Record
    - Identifiable individual
    - Contact information

2016/17/18 Changes . . .

- Internal Systems
    - Started being scrutinized after we started implementation of eXplorance
- External Hosting
    - More awareness is needed in all departments in PSI
    - IT needs to be involved (no rogue systems allowed)
    - Canada only (UK & Australia with individual consent)
    - PIA
    - FTP

2019 into the Future? . . .

- Internal Systems
  - More and more are requiring the same scrutiny as external systems
- External Hosting
  - All schools and departments will be using externally hosted services
  - PIAs required for all
  - Better resourced to address privacy
  - Canada, UK, Europe, Australia, and ?

PIA Considerations . . .

- Personal information
  - Name
  - Email
- Data & Reports
- Identifiable individual
  - Birthdate
  - Student ID
- Contact information
  - Address
  - Phone
- Data Flow

PIA Considerations (cont'd) . . .

- Institutional Policies
  - Acceptable use of Information Technology
  - Information Security
  - Safety, Security and Emergency Management
- Government Policies (FOIPOP)
  - Personal Information Bank (PIB)
    - Student
    - Faculty
    - Associate Dean

Access . . .

- Faculty, Associate Deans, System Admin, Vendor
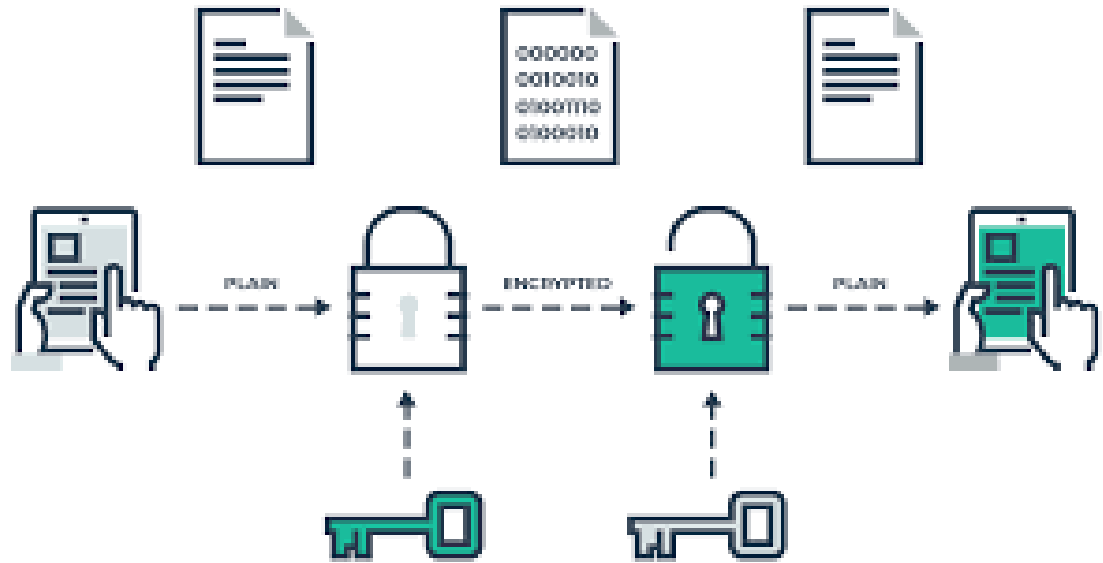
Encryption . . .

- Transferring data
- Encrypted
  - All data is encrypted during transmission. (data sync)
  - Data is transformed to a randomly, encrypted string when CRN survey is opened
  - Encryption is deleted once survey closes
  - Student ID and data is encrypted as a unique identifier when URL is sent to student

Data Storage . . .

- Firewalls, security, privacy, measures in place

- Live data or data in use is located . . .

  - PIA: protection of personal info

Retention . . .

- 48 - 60 months (collective agreement)

PIA Novices . . .

File	Date
Xplorance Blue PIA June 30.doc	2017-06-30 1:14 PM
Xplorance Blue PIA June.doc	2017-06-30 12:53 ...
Xplorance Blue PIA June 6-2017 (005).doc	2017-06-06 10:30 ...
Xplorance Blue PIA June 1-2017 (004).doc	2017-06-06 10:28 ...
PIA 2016-10_eXplorance Blue - 2017_May 29_V6 docx.doc	2017-05-29 11:04 ...
PIA 2016-10_eXplorance Blue - 2017_May 25_V6 docx.doc	2017-05-26 3:18 PM
PIA 2016-10_eXplorance Blue - 2017_May 18_V5 docx.doc	2017-05-23 5:39 PM
PIA 2016-10_eXplorance Blue - 2017_Apr 4_V4 docx.doc	2017-04-04 3:42 PM
PIA 2016-10_eXplorance Blue - 2016_Nov 17_V3 docx.doc	2017-04-04 3:42 PM
ISA - BCIT - Explorance - signed.pdf	2016-11-17 12:36 ...
PIA 2016-10_eXplorance Blue - 2016_Nov 15 docx.doc	2016-11-15 2:30 PM
PIA 2016-10_eXplorance Blue - 2016_Nov 07 docx.doc	2016-11-15 2:29 PM
ISA - Explorance.doc	2016-11-15 2:22 PM
PIA 2016-10_eXplorance Blue - 2016_Nov 02 docx.doc	2016-11-08 12:10 ...
eXplorance Blue Data flow.pdf	2016-11-07 9:39 PM
contract proposal.pdf	2016-10-28 1:31 PM
Draft BCIT Privacy Impact Assessment Form - eXplorance Blue - oct-28-16.docx	2016-10-28 12:53 ...
Draft BCIT Privacy Impact Assessment Form - eXplorance Blue - sept-19-16.docx	2016-10-28 12:52 ...
EXP-BCIT-ScopeStatement-21-07-2016 - updated.docx	2016-10-28 12:45 ...
Data flow.pdf	2016-10-27 1:08 PM
Data flow.vsdx	2016-10-27 1:07 PM
Draft BCIT Privacy Impact Assessment Form - eXplorance Blue.docx	2016-07-20 4:06 PM
BCIT Privacy Impact Assessment Form - eXplorance Blue.docx	2016-07-20 3:54 PM
SAMPLE - BCIT Privacy Impact Assessment Form - BCIT-BCITSA data transfer (final) (002).docx	2016-06-22 3:37 PM

PIA Novices . . .

36 Versions of Draft PIA

Name	Date modified
PIA 2016-10 eXplorance Blue online course evaluation for FSA (002).pdf	2018-01-16 1:12 PM
PIA 2016-10 eXplorance Blue online course evaluation for FSA.pdf	2017-12-19 2:16 PM
eXplorance Blue PIA - Dec 11 with JS comments.doc	2017-12-11 12:33 ...
eXplorance Blue PIA - Dec 11 with JS and CK comments.doc	2017-12-11 12:30 ...
eXplorance Blue PIA - Dec1-17.doc	2017-12-01 3:57 PM
Xplorance Blue PIA - Nov 23-17 updates.doc	2017-11-23 11:31 ...
Xplorance Blue PIA - Nov 9 updates.doc	2017-11-09 1:19 PM
eXplorance Blue Data flow.vsdx	2017-11-06 2:27 PM
Xplorance Blue PIA - Nov 6 updates.doc	2017-11-06 2:23 PM
Xplorance Blue PIA - Oct30_js_comments.doc	2017-11-03 1:27 PM
Visio-eXplorance Blue Data flow.pdf	2017-11-03 12:55 ...
Xplorance Blue PIA - Oct27_js_comments.doc	2017-10-30 11:49 ...
Xplorance Blue PIA - Oct19_ck_comments.doc	2017-10-27 3:52 PM
Xplorance Blue PIA for FSA only Oct 18-2017.doc	2017-10-18 1:15 PM
Xplorance Blue PIA for FSA only Oct 18-2017 NancyEdits.doc	2017-10-18 1:14 PM
Xplorance Blue PIA for FSA only Oct 17-17.doc	2017-10-17 9:40 PM
Xplorance Blue PIA for FSA only Oct 2-17.doc	2017-10-17 9:39 PM
Conf and Privacy DOC080515-08052015180610 (002).pdf	2017-10-03 5:17 PM
Xplorance Blue PIA -Sept 18.doc	2017-09-18 4:53 PM
Xplorance Blue PIA -final- sent back from Cynthia and Tracy Jo Sept 14.doc	2017-09-18 4:52 PM
Xplorance Blue PIA -final- Sept 14.doc	2017-09-14 4:34 PM
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Xplorance Blue PIA-final-asof Thursday-Sept-7-17.doc	2017-09-07 10:25 ...
Xplorance Blue PIA - final_JS updates from CK_comments (002).doc	2017-09-01 2:52 PM
Xplorance Blue PIA - final_CK_comments (002).doc	2017-09-01 1:16 PM
Xplorance Blue PIA - final (003).doc	2017-07-21 1:16 PM
Xplorance Blue PIA - final (002).doc	2017-07-18 6:02 PM
Xplorance Blue PIA July 13.doc	2017-07-13 3:09 PM

Post-Secondary Institutions in Canada . . .

- Categorized under "Public Bodies"

- Non-exhaustive list of personal information examples:

  - Name, address, email address, or telephone number;

  - Age, sex, religious beliefs, sexual orientation, marital or family status, blood type;

  - An identifying number, symbol or other particular assigned to an individual;

  - Information about an individual's health care history, including a physical or mental disability;

  - Information about an individual's educational, financial, criminal or employment history; and

  - Personal views or opinions

- Regulations in place for each province

PIA Questions to be Answered . . .

1. **Describe the system, project, program or activity?**

   - **What, who, where, when, why, how**

2. **Scope of the PIA?**

   - **Clarity and focus**

3. Any previous PIAs?

4. **Elements of data?**

5. **Storage and access of personal information?**

6. **Data-linking initiative?**

7. Common or integrated program or activity?

8. **Flow diagram or flow table**

9. **Risk mitigation?**

10. **Notifications**

Example of Privacy Notification . . .

Privacy Notice

BCIT collects personal information provided by you through the employment process and through the the Student "Opinion of Instructional Quality Survey" (SOIQS) and "student evaluation of teaching" (SET) and development system under the Authority of section 26 of the *Freedom of Information and Protection of Privacy Act* RSBC. 1996, c.165 and the *College and Institute Act*, RSBC. 1996, c.52.

Your personal information is collected and used by the Learning and Teaching Centre pursuant to Article 13.2 of the BCIT Faculty and Staff Association Collective Agreement (the "FSA Collective Agreement"). To administer the web-based Student "Opinion of Instructional Quality Survey" (SOIQS) "student evaluation of teaching" (SET) and development system quality, BCIT discloses your personal information to eXplorance, an international learning experience management solutions provider headquartered in Montreal, PQ, Canada that provides similar services to post-secondary institutions in the Canada, USA, and throughout the world.

eXplorance collects instructors' SOIQS course survey requirements and uses this information to prepare and administer the web-based SOIQS survey, collect the survey responses, tabulate and analyze the responses to provide BCIT with aggregated survey results and summary reports. This information will be used by BCIT course instructors, faculty and staff in accordance with the FSA Collective Agreement to administer the web-based Student "Opinion of Instructional Quality Survey" (SOIQS) "student evaluation of teaching" (SET) and development system quality.

BCIT is committed to ensuring the privacy and confidentiality of the survey process, and has taken the following steps to ensure the confidentiality and privacy of the survey questions, students' survey responses and survey results.

PIA Questions to be Answered (cont'd) . . .

11. **Security measures in place?**

12. Security policies in addition to the Information Security Policy?

13. How will unauthorized access be identified?

    - Prevented or mitigated

14. Addressing individual's request to update or correct their personal information

15. How decisions are made (conclusion and/or formal judgment)

    - Ie: date of birth used to determine their entitlement

16. Measure used to ensure accuracy and completeness of personal information

17. **Retention?**

18. Sharing of personal information?

19. **Will personal information be dislosed to researchers for research purposes?**

20. **APPENDICES:**
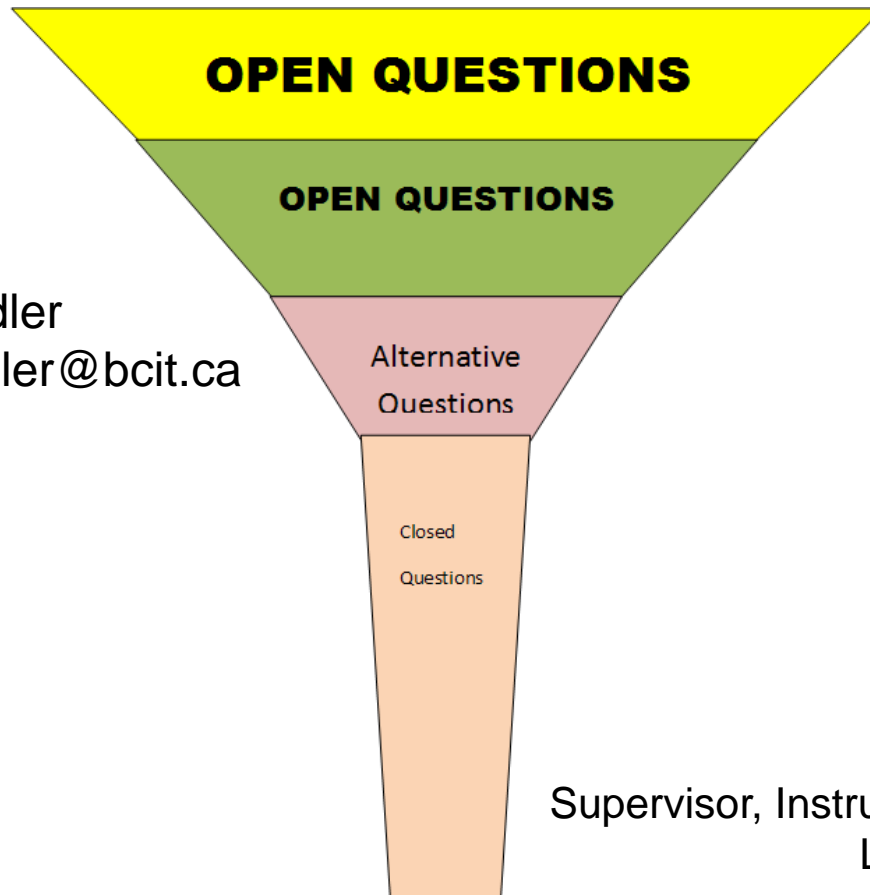
Challenges of Creating a PIA . . .

- **All stakeholders must be involved**
  - **School or department**
  - **IT**
  - **Vendor**
  - **Privacy office**
- **Ensuring all information is correct and accurate**
- **Getting final sign-off**

Benefits of Creating a PIA . . .

- Staying ahead:
    - By being current and compliant
    - For any next phases
    - For any updates

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