



# Privacy Impact Assessment

## School District 46

### *Use of MyEducation BC*

#### **Part 1 - General**

Name of School District:	SD No. 46 (Sunshine Coast)		
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#### **1. Description of the Initiative**

The Ministry of Education, Boards of Education and Independent School authorities have collaborated to procure a common student information service for use by schools in British Columbia. The Ministry, on behalf of these parties, entered into a contract with **Fujitsu Consulting (Canada)** to provide MyEducation BC, a hosted, web-based service built upon the Follett Aspen SIS software.

MyEducation BC supports the operational needs of schools and school districts and is an important tool for delivering education services and monitoring student and school performance. More specifically, MyEducation BC is a comprehensive student information service designed to:

- manage school and student information across the entire province;
- streamline the administrative processes used by schools;
- maintain a provincial student registry and electronic permanent student record; and
- prepare reports and data submissions for the Ministry.

The core functions of MyEducation BC include the management of student demographics, enrolment and attendance, programs and courses, student achievement, individual education and learning plans, and reports. A single record is maintained for each student which is available only to schools providing educational services to the student. In addition, students and parents will have the ability to access relevant student records and collaborate with teachers through a web-based portal. MyEducation BC is a strategic component of the BC Education Plan.

MyEducation BC replaces BCeSIS and participation in MyEducation BC is open to boards of education, independent schools and band schools in British Columbia (collectively referred to as "Districts") that have entered into a Memorandum of Understanding with the Ministry of Education. The service is also available to public schools in the Yukon under an inter-provincial agreement. Each member organization is represented on a Service Management Council that approves common business standards, protocols, and practices.

The service and data are housed in secure data centres in Kelowna and Regina. School staff, teachers, parents and students access MyEducation BC via a web browser using a server-side



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128-bit SSL connection. Scope of record access is determined by user roles that are managed by districts.

Responsibility for privacy is jointly-held by the Ministry and the Districts. The Ministry, through a contract with its service provider, provides the shared application software and the infrastructure. The Districts are responsible for the collection, use, disclosure, accuracy and correction of personal student information. Audit logging is a service provided by Fujitsu and audit logs are available to the school districts. Established processes for monitoring access were established for BCeSIS and will be continued under MyEducation BC. School districts are responsible for monitoring access to their information and reporting breaches as set out in their own information management policies. Access requests for information contained in MyEducation BC are the responsibility of the school district under which the student is primarily enrolled.

#### **2. Scope of this PIA**

This PIA addresses the District's responsibilities for the information entered into the MyEducation BC system.

#### **3. Related Privacy Impact Assessments**

The Ministry of Education has completed a PIA regarding its own responsibilities pertaining to the MyEducation system. It is filed in the personal information directory as EDUC14025.

#### **4. Elements of Information or Data**

Schools and school districts collect personal information on students for the purpose of administering the delivery of education in schools, managing student safety, administering of the education system, complying with laws and regulations, conducting research and compiling statistics. The major information classes stored in MyEducation BC include:

- Student data including:
  - District and provincial ID numbers
  - Address
  - Emergency information
  - Birthday
  - Custody information
  - Release information
  - Physical and health information
  - Eligibility information
  - Field trip information



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- Photograph
- Time table
- Demographic information
- Achievement and grading data
- Languages
- First Nation status
- Citizenship status
- Special Education/Individual Education Plans
- Student Learning Plans
- Class data including:
  - Roster
  - Teacher
- School data including:
  - Accident and injury data
  - Locker lists and assignments including lock combinations
  - Course information
  - Pupil-teacher contact data
  - Room and room assignment data
  - Home Room roster data
  - Transfer requests
  - Student roster data
  - Counselor roster
  - Sports team rosters
  - Family interview reports
- District data including:
  - Out of boundary data
  - Bus routes
  - Municipalities
  - Fees data
  - Meal program data
  - Enrollment data
  - Diploma and credit data
  - Attendance data
  - Co-op program data

The sensitivity of the personal information varies from very low to high.



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#### Part 2 – Protection of Personal Information

##### 5. Storage or Access outside Canada

*No student data is being stored outside of Canada. Production data for MyEducation BC is stored in a secure data centre in Kelowna and managed by the service provider, Fujitsu Consulting (Canada). A secondary data centre is maintained by Fujitsu Consulting (Canada) in Regina which is used for hosting training and support databases and is a backup site for disaster recovery purposes.*

*MyEducation BC is accessed via a web browser using server-side 128-bit SSL encryption. Public schools are connected to data centres through the Provincial Learning Network (SPANBC) and the Next Generation Network (NGN), managed by the province. Connections between data centres and service centres use dedicated circuits that are routed entirely through Canada.*

*School employees working from home, parents and students access MyEducation BC over the internet. All network traffic uses 128-bit SSL encryption.*

##### 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.	NO
<b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b>	See below

*SD No. 46 expects that data will be linked from MyEducation BC to other district data systems such as their Follett Destiny Library system and perhaps to future Active Directories. This will facilitate effective management of staff and student identities including contact, scheduling and password information.*



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#### 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);	no
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
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	

*\* Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.*

*For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.*



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#### 8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>Information is collected directly from students and guardians for enrollment and the management of the student throughout their time in school.</i>	<i>Collection</i>	<i>26(c)</i>
2.	<i>Information is collected from students during their years in school for the purposes of providing educational services.</i>	<i>Collection</i>	<i>26(c)</i>
3.	<i>Information is collected from students during their years in school for the purposes of providing academic or personal counselling or other services necessary for the student.</i>	<i>Collection</i>	<i>26(c)</i>
4.	<i>Information is collected from a school from whom the student is transferring.</i>	<i>Collection</i>	<i>26(c); 27(1)(b)</i>
5.	<i>Information is used by educators, counsellors, administrative staff, and other professionals in the school system for the purposes for which the information was collected, or for a purpose that is consistent with the original purpose.</i>	<i>Use</i>	<i>32(a)</i>
6.	<i>Student information is disclosed to the Ministry of Education for funding, accountability and public reporting as per the School Act or Independent School Act</i>	<i>Disclosure</i>	<i>33.1(1)(c); 33.2(a)</i>
7.	<i>Student information is disclosed to educators, counsellors, administrative staff, and other professionals within the school system when the information is necessary to perform their duties</i>	<i>Disclosure</i>	<i>33.2(c)</i>
8.	<i>Student information is disclosed to the necessary individuals when a student is ill or injured</i>	<i>Disclosure</i>	<i>33.1(1)(n); 33.2(a)</i>
9.	<i>Information may be disclosed if the head of the public body determines that compelling circumstances exist that would affect anyone's health or safety</i>	<i>Disclosure</i>	<i>33.1(1)(m)</i>
10.	<i>Information in the MyEducation system can be disclosed to Fujitsu Consulting (Canada) in order to install, implement, maintain, repair, troubleshoot or upgrade the MyEducation system</i>	<i>Disclosure</i>	<i>33.1(1)(p)</i>



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#### 9. Risk Mitigation Table

**Risks associated with the initiative and the mitigation strategies that will be implemented:**

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for unauthorized purposes.	District privacy training and refresher training courses on responsibilities for personal information.  All employees are required to review & sign-off on the computer acceptable use regulation (Regulation 1600) as a condition of employment.  On-line FOIPPA training is a condition of employment.	Medium	Medium
2.	Employees have unauthorized access to personal information.	Accounts are assigned to users by School District staff on a need-to-know basis. Access by staff and teachers is limited to the minimum functionality and student records required to perform their duties.	Low	Medium
3.	Unauthorized individuals (including students) gain access the system.	All authorized users are issued individual accounts by the District and receive training regarding appropriate use. Passwords must have a degree of complexity that is compliant with provincial requirements. Sessions terminate automatically after 15 minutes of inactivity.	Medium	Low
4.	Personal information could be inadvertently distributed by email.	All staff and student user accounts in MyEd will link only to an internal SD46 email account.	Medium	Low



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#### 10. Collection Notice

Requirements for the collection, storage, use, disposal and retention of student records are described in the *School Act* ss 79 Student Records and the Permanent Student Record Order.

*When collecting personal information directly from individuals you must ensure that all individuals involved are told the following:*

- 1. The purpose for which the information is being collected*
- 2. The legal authority for collecting it, and*
- 3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*

*Student Registration forms, Student Verification forms and Fieldtrip forms will indicate the purpose for collecting information, the legal authority for collecting the information, and the contact information of a school or district official to answer relevant questions about the collection of student information.*





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#### Part 3 – Security of Personal Information

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

*Student information files are stored in locked filing cabinets / vaults in school offices or at the district office. All files must be signed out when reviewing and locked securely.*

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

*Password management and user access profiles are assigned on a need-to-know basis*

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

*System security is based on the requirement for individual login accounts and passwords are assigned to connect to network resources.*

**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.**

*User access to MyEducation BC is based on specific user roles such as District Support, Teacher, Administrator, and Clerical.*

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

*Regular review of account allocations, tracking via log files, and the signing in and out of student files takes place.*



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#### 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?**

*Personal information is entered, updated and corrected by school staff, based upon information provided by students and their parents/guardians.*

*Teachers enter attendance and assessment information for students within their courses at the secondary level. At the elementary level attendance is entered by the office clerical.*

*School staff, counsellors and/or special education practitioners enter special education information and Individual Education Plans for students.*

*Requests can be made to update personal information and select courses with direct contact with the office and/or demographic verification forms sent home each year. This information is stored in MyEducation BC only after it has been reviewed by school staff and/or counsellors.*

*Changes to personal information are tracked in an audit log, which is available for review.*

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

Yes

- 18. If you answered “yes” to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

*Student placement and progress decisions are based on the personal information within the student record /file located with MyEducation BC and the student file.*

- 19. If you answered “yes” to question 17, do you have a 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?**

*Student personal information is confirmed from legal documentation. Student progress data is confirmed from physical documentation of previous achievement. Physical are used to confirm data obtained in MyEducation BC.*

*SD 46 Regulation 1850 Student Records – This regulation describes the access, transfer, retention and disposal of student records.*

*Requirements for the retention of student records are described in the School Act ss 79 Student Records and the Permanent Student Record Order.*



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#### Part 5 – Further Information

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

n/a

*Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).*

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

n/a

*Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).*

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.

n/a



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#### **Part 6 – Privacy Office(r) Comments**

*This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).*

*W*



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#### Part 7 – School District Signatures

Diane Wagner  
School District Contact  
Responsible for Protection of  
Privacy / FOIPPA

*D Wagner*  
Signature

*Aug 14/15*  
Date

Phil Luporini  
School District Contact  
Responsible for Systems  
Maintenance and/or Security

*Phil Luporini*  
Signature

*Aug 20 / 2015*  
Date

Patrick Bocking  
Superintendent of Schools

*Patrick Bocking*  
Signature

*Aug 14/15*  
Date

