



Privacy Impact Assessment Kamloops Christian School Association

Use of MyEducation BC PIA #2

Part 1 – General

Name of School District:	Kamloops Christian School Association		
PIA Drafter:	Mr. Sandro Cuzzetto CEO/Privacy Officer		
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Program Manager:	Mr. Sandro Cuzzetto		
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In the following questions, delete the descriptive text and replace it with your own.

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.



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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 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. 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 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 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:



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- 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
 - Photograph
 - Time table
 - Demographic information
 - Achievement and grading data
 - Assessment 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



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- Sports team rosters
- Family interview reports
- District data including:
 - Out of boundary data
 - Municipalities
 - 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. 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*

<p>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.</p>	
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
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	

KCSA expects that data will be linked from MyEducation BC to other district data systems such as their Follett Destiny Library system and future Active Directories. This will



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facilitate effective management of staff and student identities including contact, scheduling and password information.

7. Common or Integrated Program or Activity*

<p>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.</p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	no
<p>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;</p>	no
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	no
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

8. Personal Information Flow Diagram and/or 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>



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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>

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access personal information and use or disclose it for unauthorized purposes.</i>	<i>District privacy training and refresher training courses (on-line FOIPPA training is a condition of employment) on responsibilities for personal information.</i>	<i>Medium</i>	<i>Medium</i>



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		<i>All employees are required to sign-off on the Technology: Acceptable Use Agreement (which is clearly outlined in the school district's Board Policies and Regulation Policy E-3 – Internet Access and Use) as a condition of employment.</i>		
2.	<i>Employees have unauthorized access to personal information.</i>	<i>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.</i>	<i>Low</i>	<i>Medium</i>
3.	<i>Unauthorized individuals (including students) gain access the system.</i>	<i>All authorized users are issued individual accounts 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.</i>	<i>Medium</i>	<i>Low</i>
		<i>Parent Portal accounts are double-checked for accuracy by schools prior to account creation. Portals are deleted at the end of each year and recreated the next year which ensures that graduated students or students who have left the district no longer have a portal account.</i>	<i>Low</i>	<i>Medium</i>



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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.*

This is done in the registration package that parents first fill out as well as in the annual consent form packages. It reads:

All information provided on this form is collected under the authority of the *School Act, Section 13 and 79 and/or ministerial Order M152/89*. The information provided will be used for educational programs and administration purposes, and when required, may be provided to health services, social services, support services, or the Ministry of Education's data services as outlined in *Section 79 (2) of the School Act*. The authorizations collected on this form will be kept secure and confidential in accordance with the *Freedom of Information and Protection of Privacy Act* and the *School Act*. This authorization will be updated on an annual basis for a 12-month term commencing October 1 – September 30. If you have any questions or concerns regarding this form, please contact your school Principal.

Part 3 – Security of Personal Information

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

- Student files are in locked filing cabinets/vaults in school offices
- All schools are locked after school hours and accessible only by key card/code.
- Teacher laptops are stored individually by each teacher. Teachers must use a domain login (user name/password) to access the laptop.

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



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- Only our Technology Department has access to create, delete or edit teacher accounts. Accounts are updated by September 30th of the school year by each school once their staff is finalized.
- Passwords can be reset by each individual teacher as needed.
- Parent Portal accounts are created after Student Verification forms are sent home
- Parent Portal/Student Portal accounts are deleted at the end of each year and recreated after the information is updated in the beginning of the year.
- Firewalls are in place for each school.

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

Only our Technology Department has access to create, delete or edit teacher accounts. Accounts are updated by September 30th of the school year by each school once their staff is finalized.

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.

Each September, school administrators will work with their clerical staff to ensure that only staff authorized for MyEd use in their school is in their staff list. That list of teachers is given a school account, which includes email, Google Drive access, etc. When any staff leave the district, the administration sends our tech department an email and they deactivate that person's school account.

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

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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**



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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.

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

Through the parent and student portals requests can be made to update personal information and select courses. 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. Parent access to the information through the Parent Portal gives them an opportunity to review the information in MyED and ask the school to make changes if necessary.

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 documentation are used to confirm data obtained in MyEducation BC.

KCSA Policy No: 3.6 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).

Part 7 – School District Signatures

Mr. Sandro Cuzzetto
Program/Department Manager
Privacy Officer/Privacy Office
Representative

Signature

A handwritten signature in black ink, appearing to read "Sandro Cuzzetto", is written over a horizontal line.

Dec. 22, 2020
Date

If you have any questions, please contact your school district's privacy office(s) or call the OCIO's Privacy and Access Helpline at 250 356 1851.

A final copy of this PIA (with all signatures) must be kept on record.