

PIA Report: Padlet Use in FoE Courses - PIA02077

KB0018013

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The purpose of a Privacy Impact Assessment (PIA) is to determine whether a Project or Initiative complies with the BC Freedom of Information and Protection of Privacy Act (FIPPA), Information Systems Policy (SC14) and UBC Information Security Standards (ISS).

This document is to advise that the PIA review of the Project has been completed. The following outlines the scope, risks and conclusions associated with this PIA.

PART 1: GENERAL INFORMATION & OVERVIEW

Executive Summary

The UBC Faculty of Education (FoE) uses Padlet, a SaaS tool hosted on the Google Cloud Platform that allows real-time collaborative web platform in which users can upload, organize, and share content to virtual bulletin boards called "padlets" (similar to a text box). At UBC, padlets are embedded as iframes within the Canvas learning management system (LMS). Students interacting with the padlets when they use the LMS but there is no integration otherwise, and Padlet does not access Canvas data. Students register for an account with Padlet and are then able to post content and respond to discussions. Instructors will use content posted in padlets within their courses to grade online participation.

Risk Classification

The inherent privacy risk classification level of this PIA submission is 4 - High.

The residual risk classification level of this PIA submission at closure is 3 - Medium.

1.1 Unit and Program Area

PIA Reference	PIA02077
Project	Padlet Use in FoE Courses
VP Executive Unit	VP Academic and Provost
Unit Area	Faculty of Education Professional Development and Community Engagement

1.2 Contact Information

This refers to the UBC employees who own the project or are most qualified to respond to questions regarding the PIA.

Requestor Name	Ian Linkletter	ian.linkletter@ubc.ca
Project Manager	Ian Linkletter	ian.linkletter@ubc.ca
Owner	Natasha Boskic	natasha.boskic@ubc.ca

This refers to the UBC employee who conducted the PIA.

Report Prepared by	Christian Stockman	christian.stockman@ubc.ca
Report Created	2021-10-27 15:55:14	

1.3 Description of the Program, System, Application, or Initiative Assessed

Instructors at the Faculty of Education have been using Padlet frequently in their courses over the past year. This is because it adds a new level of interaction to online courses, facilitating discussions in a way that's more visual than a Canvas Discussion board. However, before we promote and officially support this tool, we would like a PIA conducted on Padlet.

1.4 Scope

The scope of this PIA is the implementation of Padlet for direct use by UBC faculty, staff, students and others who are authorized to use these products and services on behalf of UBC.

1.5 Related PIAs

1.6 Data Elements

Padlet doesn't require students to create an account or add their names in order to contribute to a board. An email address is mandatory for users to use Padlet as registered users. Other data is optional like name and username can be aliases. Optional information may be provided, including a profile photo. Padlet can also be used in a guest mode where registration is not required. Instructors often will ask students to include their first names in posts in order to grade participation. Users are actively discouraged from providing real names and personal information beyond the first name or alias for grading purposes.

Padlet uses tracking cookies and Google Analytics to gather personal information about users and their devices, including IP address (geolocation)

1.7 Storage or Access Outside of Canada (including back-ups and recovery)

Padlet stores personal information on servers outside of Canada in the USA. Services are primarily hosted in Google Cloud. Backups are maintained on AWS servers.

1.8 Data-Linking Initiative

In FIPPA, "data linking" and "data-linking initiative" are strictly defined; if a project is a data linking initiative, it must comply with specific requirements under the Act related to data-linking initiatives.

This project is not considered a data linking initiative as contemplated under s.(36) of FIPPA.

1.9 Is this a Common or Integrated Program or Activity? If so, how?

In FIPPA, "common or integrated program or activity" is strictly defined; where one exists it must comply with requirements under the Act for common or integrated programs and activities.

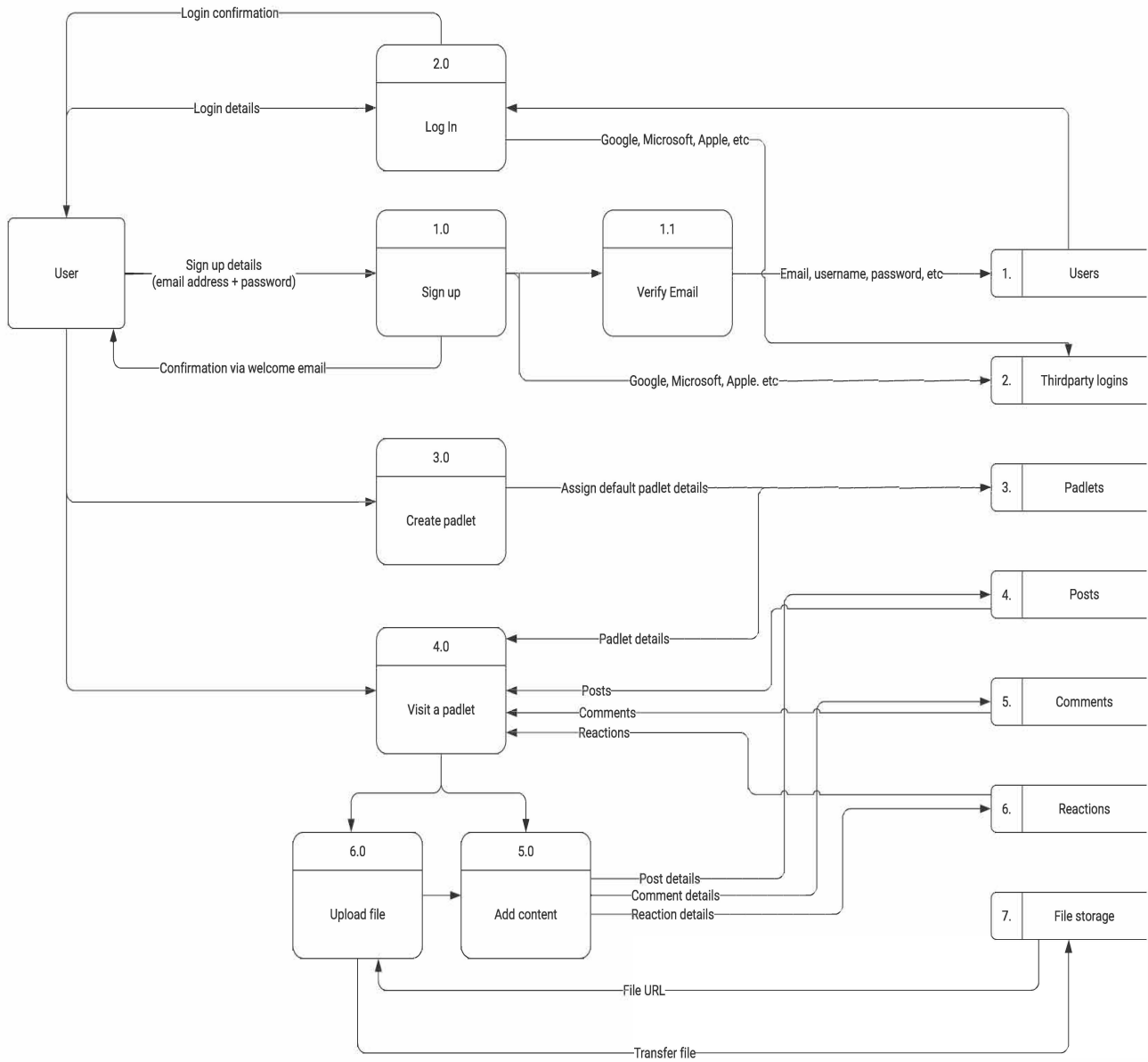
This project is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.

PART 2: PROTECTION OF PERSONAL INFORMATION

2.1 Personal Information Flow

The following data flow was supplied.

Dataflow Diagram (Padlet Basic/Pro)



2.2 Risk Mitigation Table

The following table outlines risk identified in relation to the project and recommended response plan.

Category: Privacy					
Risk	Ref#	Inherent Likelihood	Inherent Impact	Response	Residual Risk
Disclosing to or allowing unauthorized users access	RK0020786	4 - High	4 - Major	Mitigate	2 - Low

	Mitigation Plan: Personal information will not be disclosed to or shared with third parties internal or external to UBC. Padlet will have access to all information on the boards. The rest of the students in the course and the instructor will also be able to see other student contributions within Canvas. Padlet contents remain with the Canvas learning management system. No integrations exist between Padlet and Canvas, as the Padlet contents exist independently of Canvas (embedded as iframes).				
Retaining PI longer than necessary	RK0020930	4 - High	3 - Significant	Mitigate	2 - Low
	Mitigation Plan: The FoE has committed to retaining personal information for the one-year minimum required time under FIPPA, and to meet academic appeal requirements. The FoE should regularly request Padlet to dispose of all unnecessary personal information beyond the one year mark, and to confirm that this has been done. The FoE is encouraged to develop a formal records retention plan in conjunction with the UBC Records Management Office.				
Inadequate third party information sharing controls	RK0020785	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: Users have the ability to register for Padlet using Google, Apple, or Microsoft login credentials. Use of these services is discouraged, as it will link Padlet access to third party vendors and enables uncontrolled collection of additional personal information subject to the terms and conditions of these services.				
PI stored / accessible outside of Canada	RK0020784	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: Students will be presented with a privacy notification and will be required to consent to having their personal information stored outside of Canada. Students may also opt to use an alias. Any student not wishing to consent will be provided with an alternative option at the outside of the course.				
Category: Security					
Risk	Ref#	Inherent Likelihood	Inherent Impact	Response	Residual Risk
Weak or absence of technical security controls	RK0020931	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: FoE to work with the vendor to implement password minimum length of 10 characters with complexity to comply with UBC Password Standards. Alternatively, users can manually set their passwords to follow the UBC password requirements.				

2.3 Collection Notice

Recommended collection notice:

"Your personal information is collected under the authority of section 26(c) of the Freedom of Information and Protection of Privacy Act (FIPPA). This information will be used for the purpose of enabling your participation in UBC courses and evaluating your participation. By submitting your personal information, you are consenting to the storage of this information on a secure server located in the United States. Questions about the collection of this information may be directed to <INSERT EMAIL>@ubc.ca."

2.4 Consent for Storage/Access Outside of Canada & Opt-Out Procedure (If Any)

Students using Padlet will be required to consent to having their personal information stored outside of Canada. Alternatively, students may use an alias name and email address or their @students.ubc.ca email address for registration.

2.5 Consent Withheld Procedure

Students not wishing to use Padlet or who do not wish to have their personal information stored outside of Canada will be presented with an alternative option at the start of each term to enable their participation on the course.

PART 3: SECURITY OF PERSONAL INFORMATION

3.1 Physical Security Measures

For example: locked cabinets, securely stored laptops, or key card access to the building.

This project is required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards).

3.2 Technical Security Measures

This project is required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards).

3.3 Security Policies, Procedures, and Standards

This project is required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards).

Padlet has completed a HECVAT and is targeting SOC 2 attestation in 2022.

3.4 Tracking Access / Access Controls

The vendor will have access to all information on the padlet boards within the Canvas LMS. The rest of the students in the course will also be able to see other student contributions, as would instructors. Personal information pertaining to registered users would be available to UBC FoE account administrators. Third party sub-processors are used to provide some services, and will have access to personal information (i.e. email notification and processing).

PART 4: ACCURACY, CORRECTION, AND RETENTION

4.1 Updating and Correcting Personal Information

Not applicable

4.2 Decisions That Directly Affect an Individual

This project captures personal information that directly affects an individual. Under s.(31)(b) of FIPPA, personal information used to make a decision about an individuals must be retained for at least one year.

4.3 Records Retention and Disposal

This project is required to comply with UBC Records Management Policies.

The FoE has confirmed personal information is retained for a year and a day at minimum to comply with academic appeal requirements. Padlet has confirmed they destroy all personally identifiable data when it is no longer needed for the purpose for which it was obtained. For individual accounts, users can request an account deletion from their settings panel. For schoolwide accounts, account owners can request for account deletion and we will delete all PII within 60 days. It is recommended that the FoE develop a formal records retention policy to govern disposition of Padlet data.

PART 5: FURTHER INFORMATION

5.1 Systematic Disclosures of Personal Information

This project does not involve the systemic disclosure of personal information.

5.2 Access for Research or Statistical Purposes

This project does not involve the disclosure of personal information for research or statistical purposes as contemplated under s.(35) of FIPPA.

5.3 Other Applicable Legislation

This section includes any other legislation which was taken into consideration or might have impacted this review (e.g., GDPR, other jurisdictional requirements, etc.)

This project is not subject to other applicable legislation or regulations.

PART 6: ACCESS AND PRIVACY COMMENTS

6.1 Information or Materials Reviewed

This section indicates reference materials which were provided to support this review.

The following documentation was reviewed in the context of this PIA. The provided information was deemed reasonable to provide an understanding of operating privacy and security controls

Information Reviewed	Date Received
Padlet Dataflow Diagram.jpg	2021-10-22 19:35:55
Padlet HECVAT.xlsx	2021-09-11 01:56:55
Padlet Privacy Policy.pdf	2021-09-11 01:56:55
Padlet subprocessor list.xlsx	2021-10-22 18:31:12
Padlet technical physical organisational measures.pdf	2021-09-11 01:56:55
Padlet Terms of Service - Schools.docx	2021-09-11 01:56:55
Padlet Terms of Service.pdf	2021-09-11 01:56:55

6.2 Analysis and Findings

This is the assessment based on the project materials provided for review.

The information provided for the review has established that Padlet and the associated use-case, as presented by the UBC Faculty of Education, can be used in the proposed manner in compliance with FIPPA and UBC policies and standards.

The following are the key factors in that determination:

- Personal information is collected, stored, and accessed within Canada, and outside fo Canada with appropriate consent;
- Personal information is not disclosed to third parties external to authorized UBC staff members and the vendor's support teams;
- Access to the service requires use of a valid login credentials with appropriate access authorities;
- Information is kept secure during transmission and at rest.

Based on our understanding of the collection, use, disclosure, and retention of personal information, our review noted the key privacy and information security risks and the risk mitigation plan is recommended and provided to the project. The project has agreed and implemented the recommended remediation actions as outlined in the risk mitigation plan to

minimize risk exposures and to comply with the FIPPA requirements and UBC Information Security Standards.

Accordingly, Padlet can be used as proposed subject to the conditions outlines in the following section.

6.3 Conditions of Approval

Where applicable, this refers to any conditions or limits to the scope for this PIA.

Our review has concluded that there are no significant privacy or information security risks introduced by this project. We do recommend, however, that the project ensure that it continues to fully comply with BC FIPPA legislation and the UBC Information Security Standards.

6.4 Review and Distribution

This refers to the report approval process. The Owner is accepting the accuracy of the data provided to PrISM for this review and the risk responses. The Owner is responsible for the on-going operational activities and must ensure that this project continues to meet legislative and legal requirements, along with Information Systems Policy (SC14) requirements. Any change in PI collection or use will require new PIA.

Assessment Acceptance	Natasha Boskic
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This refers to the report distribution, including Requestor, Project Manager, Owner, and assigned Risk Advisor.

Distributed To	Requestor: Ian Linkletter, Learning Technology Specialist Project Manager: Ian Linkletter, Learning Technology Specialist Owner: Natasha Boskic, Director, Learning Design Risk Advisor: Christian Stockman, Information Security Risk Advisor
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PIA Request History:

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