



PRIVACY IMPACT ASSESSMENT

BASIC INFORMATION - New or Existing Program, System or Legislation

Public Body and Program Area

School District: School District 69 (Qualicum)

Initiative Title: Google Apps for Education

Contact Position and/or Name, Telephone Number and E-Mail Address.

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Description of the Program/System/Legislation (Initiative) being assessed.

This privacy impact assessment (PIA) has been adapted from the PIA created by the BC Ministry of Education in facilitating the provision of Microsoft Office 365 cloud-based services for students across BC and to ensure that these services are offered in way that is compliant with the Freedom of Information and Protection of Privacy Act (FOIPP Act). SD69 School district has adapted the template for use with Google Apps for Education (GAFE) which is a similar offering to the services offered by the original Microsoft Office 365 PIA template, and SD69 Qualicum has adapted that for use within our environment. Included in this PIA (Appendix D) is a completed checklist that was part of the original Microsoft Office 365 for Education PIA. That PIA stated:

“Based on this PIA, a checklist has been created that will serve as a means for School Districts to determine if their use of an Office 365 Solution meets the requirements set out in the FOIPP Act. If a School District meets all of the criteria set out in the checklist, this PIA and accompanying checklist may serve as the School District’s PIA as required under s. 69(5.3) of the FOIPP Act. Each School District is responsible to ensure that it has appropriate authority under the FOIPP Act to collect, use, and disclose any personal information as part of its involvement with this initiative.”

We have included a copy of the Office 365 for Education checklist, modified and completed for our Google Apps for Education initiative, to show that we have met the list of requirements needed for a school district to move ahead with providing students access to ‘cloud-computing’ tool suite as Office 365 or Google Apps for Education.

Use of Google Apps for Education for Education Service by SD69 Qualicum students:

School District 69 (Qualicum) would like to offer students limited access to the Google suite of services included as a part of the Google Apps for Education application. Google Apps for Education (<http://www.google.ca/enterprise/apps/education/>) offers a number of elements for communication and collaboration, most notably email, calendars, online storage, document viewing and editing in a web browser, and collaborative workspaces, and offers them free of charge for students.

Google will offer their services to those who are confirmed as students of School District 69 (SD69).

Participating students will have signed informed consent forms acknowledging that their personal

information will be disclosed, stored and accessed outside of Canada. SD69 will not share any student information with Google for the purpose of student account creation for any students where consent has not been obtained. SD69 will facilitate the consent-gathering by sending home with every student a letter of intent (Appendix A) along with a consent form (Appendix B).

The consent forms will meet the criteria set out in the *Freedom of Information and Protection of Privacy Regulation* section 11 (Appendix C).

School District 69 (Qualicum) will provision a Google account based on the list of students who have signed/have had their parents sign consent forms (as applicable, pursuant to s. 3 of the FOIPP Act Regulation). The only data required to provision the account is first name, last name and email address based on district naming standard, along with their respective school and grade level in the District. This will allow the student access to the appropriate school Google Apps for Education collaborative environment. The School Districts will in turn store all consent forms. A sample consent form is attached to this PIA as Appendix B.

Once this process is complete, student accounts will be activated, which will provide the student access to the following Google Apps for Education services:

Students (Grades K-7)	Students (Grades 8-12)
GAFE email account (Walled Garden)	GAFE email account
Google Drive (unlimited storage)	Google Drive (unlimited storage)
Google Docs (online word processor, spreadsheets, presentation, surveys, drawings)	Google Docs (online word processor, spreadsheets, presentation, surveys, drawings)
Default for Docs is private to the user	Default for Docs is private to the user
Docs can only be shared with other SD69 Domain users	Docs can only be shared with other SD69 Domain users
Additional filtering and flagging in Docs for inappropriate content	Additional filtering and flagging in Docs for inappropriate content
Google Calendar	Google Calendar

The use of the Google Apps for Education service is not an educational requirement for students. Students will not be obliged to use these digital tools, and all school activities that rely on the use of these digital tools must allow for and accept alternate and equivalent means of student participation. At no time can a student be denied participation in a school-sponsored event or activity because they have not registered for a School District 69 (Qualicum) Google Apps for Education account.

School District 69 (Qualicum)'s Policy on the Use of Google Apps for Education ("Use Policy"):

Students' Google Apps for Education use is intended to aid in the educational process and facilitate the instruction of digital, and online-based skills in order to better equip them for the working world. As a District-managed and support tool, the use of the Google Apps For Education tools falls under the School District 69 (Qualicum)'s pre-existing "Internet Access and Network Citizenship" Policy (Board Policy 5056, Appendix E).

Additionally, the School District 69 (Qualicum) has created an additional set of Acceptable Use Guidelines (Appendix G) that outlines the specific types of information that can be created or shared within the SD69 GAFE platform. These Acceptable Use Guidelines will be shared widely with staff and students. These will form the basis for professional in-servicing for those teachers using SD69 GAFE with their students. It will also include training materials specifically for students. The SD69 GAFE Acceptable Use Guidelines are also available on an informational website that has been launched to inform staff, students and parents about the SD69 GAFE platform. (<http://www.sd69.bc.ca/Programs/Gafe/Pages/default.aspx>)

School District Custody and Control:

The scope of the *Freedom of Information and Protection of Privacy Act* applies to any records in the custody or control of the public body. The School District will only maintain custody or control, as contemplated in the FOIPP Act, over those records that are created as a function of the School District's implementation of the Google Apps for Education Program. For greater certainty, this will include only those emails, assignments, documents, discussion threads, and other miscellaneous records that are created for the purposes set out by the School District 69 (Qualicum) as outlined in the SD69 GAFE Acceptable Use Guidelines (Appendix G)

Any records created as a result of students' personal use of the Google Apps for Education Program (i.e. outside of the scope of 'educational purposes') will not constitute records in the custody or under the control of the School Districts for the same reasons as those set out in The Ontario Superior Court decision: *City of Ottawa v. Ontario*, 2010 ONSC 6835. In the same way that the records created by the public body employee in question in that court decision that were of a personal nature were deemed to be not in the custody or control of the public body, any records created by students that are personal in nature will be deemed not to be in the custody or control of the School Districts, as all of the same factors are present here.

For the following reasons (but not exclusively so) the records created as a result of personal use will not fall under the custody or control of the School Districts.

The records:

- a. do not relate to the functions or mandate of the School District (i.e. they are of personal nature, not for educational purposes);
- b. are created by the students on a voluntary basis; and
- c. are not under the regulatory authority of the School Districts – though they may have possession of the records (i.e. they rest on their provisioned Google Apps for Education servers) they do not have the authority to regulate the emails' use and only have possession of the email records by happenstance.

		Yes	No
a)	Does this PIA involve a common or integrated program/activity (as defined in the FOIPP Act)? And		x
b)	Is the common or integrated program/activity confirmed by the written requirements set out in the regulation?		x
c)	Does this PIA involve a data-linking initiative (as defined in the FOIPP Act)?		x

If yes, please ensure you have notified the Office of the Information and Privacy Commissioner at an early stage of development of the initiative pursuant to section 69 (5.5) of the FOIPP Act.

Purpose/Objectives of the initiative (if statutory, provide citation):

- To support School District 69 (Qualicum) schools and teachers with their request to provide secure, online “cloud-computing” tools for digital productivity, file storage, collaboration and communication.
- To effectively use Google Apps for Education for teaching and learning purposes.
- To assist School District 69 (Qualicum) in providing access to globally-used and relevant advanced technology tools in order to enhance the learning environment for students and teachers.
- To provide these tools to the district in a secure and cost-effective manner. The Google Apps for Education implementation provides a low-cost solution.

What are the potential impacts of this proposal? (Include privacy impacts in this description).

While Google Apps for Education provides staff and students with access to the similar tools as a ‘public’ Google account, there are important differences between the two. School District 69 (Qualicum) provides access to and manages Google Apps for Education accounts for staff and students in the district. These applications are different from public Google applications (such as a public Gmail account) in that they are managed by the district, do not present users with advertising or scan student or staff information for advertising, and allow for stricter filtering and application control by School District 69 (Qualicum) system administrators.

Student emails and/or other digital files will be stored on servers outside of Canada. This impact will be managed through policy (Appendix E, Appendix G), required professional training for staff on appropriate use of the SD69 GAFE, and the creation of an informational website (<http://www.sd69.bc.ca/Programs/Gafe/Pages/Privacy-and-Personal-Information.aspx>) for staff, students, and teachers, and consent forms for parents. (Appendix B)

Students and their parents will be made aware of the fact that those consenting to the use of Google Apps for Education will have their personal information and any created or shared documents disclosed to, stored in, and possibly accessed from outside of Canada. Therefore, the School District 69 (Qualicum) cannot guarantee protection of secret disclosures of information to a foreign authority as a consequence of foreign laws.

Further to this impact there are also a number of risks that arise from the public use of any ‘cloud computing’ tool. In order to address these risks, the School District 69 (Qualicum) has created a SD69 GAFE Risk Mitigation Strategies document (Appendix H) that outlines the various tactics and efforts the District has made to greatly reduce the possible risks of using the GAFE platform with our students.

Access to SD69 GAFE by SD69 System Administrators:

As per the School District 69 (Qualicum) Internet Access and Network Citizenship (Appendix E; 1. d.), all activities conducted on the School District 69 (Qualicum) GAFE platform are private and safe except when teachers or administrators may need to gain access to those files. Nothing is to be done on the GAFE platform that the staff or student does not want other students, school staff or the District staff to see. SD69 system administrator(s) may block messages or remove files that are unacceptable and/or in violation of the School Board policies or administrative procedures.

SD69 system administrators will not intentionally inspect the contents of users' GAFE email or documents, or disclose the contents to anyone other than the sender, or intended recipient, without the consent of the sender or intended recipient, unless required to do so by law or the policies of the District, or to investigate complaints regarding electronic files which are alleged to contain defamatory, inaccurate, abusive, obscene, profane, sexually oriented, threatening, racially offensive or illegal material. The system administrator(s) have established content filters for unacceptable content in all email and documents created in the district GAFE platform.

Access to SD69 GAFE by Google:

As per the GAFE terms of service and Google privacy policy, all the personal account information and any content created or uploaded into the SD69 GAFE platform is owned by the School District 69 (Qualicum), and will not be shared or sold to third-party organizations. However, as outlined in their privacy policy, Google does maintain the ability to access and share any personal or content data on the SD69 GAFE platform under the following circumstances:

- If Google has obtained additional consent from the user to share personal information; or
- For legal reasons. Google will share personal information with companies, organizations or individuals outside of Google if they have a good faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - meet any applicable law, regulation, legal process or enforceable governmental request.
 - enforce applicable Terms of Service, including investigation of potential violations.
 - detect, prevent, or otherwise address fraud, security or technical issues.
 - protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

Google employees will access account data only when one of the SD69 system administrators grants Google employees explicit permission to do so for troubleshooting purposes. During the course of troubleshooting an issue or other investigation, the Google Support team may ask for the creation of a test administrator account, solely to be used to resolve the particular issue at hand. Google employees or automated systems may also take down any content that violates the Terms of Service.

In light of these impacts, School District 69 (Qualicum) Leadership have carefully reviewed the Privacy Policy and the Terms of Service for Google Apps for Education, and are comfortable the potential risks that may occur.

Access to SD69 GAFE by Contractors:

There may be times when work needs to be done on the SD69 GAFE system by contractors. This will be required only by the direction of SD 69 administrators.

Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).

No previous PIA has been completed on this initiative.

IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO X. SIGNATURES.

****IMPORTANT NOTE:** The FOIPP Act defines personal information as "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted.

DESCRIPTIVE INFORMATION

Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information. [See note above about the definition of personal information.] For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.

If you require additional information, please contact the District School Board Office (PO Box 430, 100 Jensen Avenue East, Parksville, BC V9P 2G5) at 250-248-4241 to connect with the School District 69 FIPPA Officer.

For the purposes of setting up the Google Apps for Education accounts, School District 69 (Qualicum) will share with Google the first and last name, email address, grade level and school name of the participating students.

Once student accounts are created, School District 69 (Qualicum), through Google, will be collecting student emails and documents (relating to educational purposes – i.e. only those addressed to faculty and staff, and those to other students for school and not personal purposes), and any records created in the collaborative application suite that are created for educational purposes. The types of information acceptable within the SD69 GAFE have been outlined in the SD69 GAFE Acceptable Use Guidelines document. (Appendix G)

Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.

Google Apps for Education distinguishes between two types of data in the service:

- Account data – student first and last name, email address, grade level and school name used for the creation of a SD69 GAFE account.
- Usage data – educational content created or shared within the SD69 GAFE platform.
- As per the Google Apps for Education Terms of Service, this data is owned directly by the School District 69 (Qualicum), whose administrative resources (outside of the above mentioned special circumstances) have control over the data in Google Apps for Education.
- The following illustrates the flow of information between the School District 69 (Qualicum) and the Google Apps for Education service:
- School District 69 (Qualicum) enters into an agreement with Google for the provision of Google Apps for Education for Education services for students
- School District 69 (Qualicum) completes a Privacy Impact Assessment pertaining to their use of the Google Apps for Education service for student use. The assessment could be the completion of the checklist (Appendix D), using this PIA as a guide.
- Students or their parent or guardian, where applicable, provide to the School District their signed informed consent (see Appendix B) for their information to be disclosed and stored outside of Canada. School Districts create and activate the email accounts for only those students where consent has been obtained.
- Once activated, the SD69 GAFE account provides students with access the district-managed collection of online tools. Students can access their SD69 GAFE account from any web-enabled device that allows them to privately and securely create educational documents.

PERSONAL INFORMATION COLLECTION (Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act") ****IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1.

	Yes	No
Is personal information being collected?	x	

IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO IV. USE OF PERSONAL INFORMATION

1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No
a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		x
If yes, please specify the name of the Act and relevant section			
b)	Is the personal information being collected for law enforcement purposes?		x
c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?		x
d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		x
If yes, please specify the prescribed purpose.			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?		
	and		
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?		x
e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?		X
f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X
g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public? Please identify event:		X
h)	Is personal identity information being collected by:		
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2,		X

A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		x
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If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question.

2) How will the personal information be collected?

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No
Will the personal information be collected directly from the individual that the information is about?	x	

IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO [3. NOTIFICATION TO COLLECT INFORMATION](#).

3) Notification to collect information

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No
	Has the individual from whom personal information is being collected, been informed of:		
	(a) the purpose for collection?	x	
	(b) the legal authority for collection?	x	
	(c) the contact information of the person who can answer questions regarding the collection?	x	
	Additional details as required (e.g., method of notification) Students and parents will be notified of the collection of personal information on the consent form.	x	

IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

	Yes	No
Is personal information being used?	x	

IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO [V. DISCLOSURE OF PERSONAL INFORMATION](#)

Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.

The public body **must** check one or more of the authorities listed below: **s.32**

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)	x		
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	x		
	Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.			
	The purpose of the collection of the personal information is for the provision of the Google Apps for Education account for staff and students.			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		x	
	Specify subsection(s) being applied			

If you have not checked one of the above, you do not have the authority to use the information.

V DISCLOSURE OF PERSONAL INFORMATION (Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	x		

IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO [VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION](#).

A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.

1) Disclosure of Personal Information

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please choose the main authorization(s) for disclosure below. All authorities that may apply do not need to be checked, only the main authorizations for the initiative.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		x	

(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j): 22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if		x	
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		x	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		x	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		x	
	(i) the disclosure reveals details of a license, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		x	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		x	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	x		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada that authorizes or requires its disclosure		x	
	Specify name of enactment and relevant section(s)			
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i>) that authorizes or requires the information to be made public		x	
	Specify name of enactment and relevant section(s)			
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada		x	
	Specify name of enactment and relevant section(s)			
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee,		x	

	and (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada			
	If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i>			
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body,			
	and (ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada		x	
	If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i>			

(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		x	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		x	
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		x	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by		x	
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	and (ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			

	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		x	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		x	
	(iii) resolving an issue regarding such a payment		x	
(1)(j)	(i) Repealed.		x	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		x	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licenses		x	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		x	
(1)(m)	If (i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and (ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		x	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		x	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		x	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		x	
(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, troubleshooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or		x	
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body			
	and			

	(ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the minimum time necessary			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. Please identify event:		x	
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about, Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, and Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).		x	
	Additional details as required			
(1)(s)	<u>In accordance with section 35 (disclosure for research or statistical purposes).</u>		x	
(1)(t)	<u>To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information</u>		x	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	To another law enforcement agency in Canada		x	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		x	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.		x	

(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if, (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		x	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		x	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		x	
Additional details as required				
s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(a)	For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)		x	
Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.				
(b)	Repealed.			x
(c)	To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister		x	
(d)	To an officer or employee of (i) a public body, or (ii) an agency or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed		x	
(e)	To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister		x	
(f)	To the auditor general or any other prescribed person or body for audit purposes		x	
(g)	To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem		x	
(h)	To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry		x	
(i)	To a public body or a law enforcement agency in Canada to assist in a specific investigation			

	(i) undertaken with a view to a law enforcement proceeding, or		x	
	(ii) from which a law enforcement proceeding is likely to result		x	
(j)	To the archives of the government of British Columbia or the archives of a public body, for archival purposes		x	
(k)	Repealed.		x	
(l)	To an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body		x	
Additional details as required				
s. 33.3	Disclosure to Public Without Request	Yes	No	n/a
(1)	Do the records fall within a category established under section 71 (1)?		x	
Additional details as required				
(2)	Do the records fall within a category established under section 71.1 (1)?		x	
Additional details as required				

2) Systematic or Repetitious Disclosure/Exchanges?

		Yes	No	n/a
i.	Do the disclosures of personal information under section 33.2 occur on a regular basis?		x	
ii.	Has an Information Sharing Agreement been completed for these disclosures/exchanges?		x	
iii.	Has information related to the Information Sharing Agreement(s) been entered into the Personal Information Directory ?		x	

Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.

3) Research or Statistical Purposes (Section 35)

	Yes	No	n/a
Has a researcher requested access to personal information in an identifiable form for research purposes?		x	

If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact Knowledge and Information Services for assistance.

Please note: Research using personal information may only be conducted if it meets all of the terms of section 35.

4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

		Yes	No	n/a
(a)	The disclosure would not be an unreasonable invasion of personal privacy under section 22			x
(b)	The disclosure is for historical research and is in accordance with section 35 (research agreements)			x
(c)	The information is about someone who has been dead for 20 or more years			x
(d)	The information is in a record that has been in existence for 100 or more years			x

If you have not answered “yes” to any of the above authorizations for disclosure you do not have the authority to disclose personal information.

VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION

(Section 28 and section 29 of the FOIPP Act)

If an individual’s personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	x		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	x		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	x		
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				

Policy/procedure:	School District 69 (Qualicum) Policy 9003 and 9004 (Appendix F, I)
Contact person:	Karin Hergt
Phone number:	(250) 954-4679
Additional details as required	

VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the FOIPP Act)

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:	School District 69 (Qualicum) Policy (Appendix F, I)		
	Contact person:	Karin Hergt		
	Phone number:	(250) 954-4679		
Additional details as required				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an ongoing audit process that can track use of the system (e.g., when and who accessed and updated the system)?	X		
Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances				
Google keeps an audit log of all activities on the GAFE platform. These logs will be reviewed as required.				
7.	Does the audit identify inappropriate accesses to the system?	X		
Additional details				

VIII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?		x	

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	x		
<p>Please explain</p> <p>Student first and last name, email address, school and grade level as well as emails and/or other digital files created in the system will be stored on servers outside of Canada. Students and their parents will be made aware of the fact that those using Google Apps for Education will have their personal information disclosed to, stored in, and accessed from outside of Canada. School District 69 (Qualicum) will facilitate the consent-gathering by sending home with every student a letter of intent (Appendix A) along with a consent form (Appendix B).</p>			
(b) Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	x		
<p>Please explain</p> <p>Yes, it is authorized after they have given informed consent.</p>			
(c) Will the personal information be disclosed under section 33.1(1)(i.1)?		x	
<p>Please explain</p>			

If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact Knowledge and Information Services.

IX RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	x		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?	x		

If you answered "no" to the above questions, your procedures may need to be revised. Please contact your Records Officer.

Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.

Comments:

X SIGNATURES

PUBLIC BODY APPROVAL:

School District Program Manager	Signature	Date
School District Contact Responsible for Privacy and Security	Signature	Date
Superintendent	Signature	Date

Appendix C

For those School Districts not using the consent form in Appendix B, their consent form must meet the requirements of the following section of the FOIPP Regulation:

Consent respecting personal information

(1) For the purposes of section 26 (d), 30.1 (a), 32 (b) and 33.1 (1) (b) of the Act, consent must

(a) be in writing, and

(b) be done in a manner that specifies:

(i) the personal information for which the individual is providing consent, and

(ii) the date on which the consent is effective and, if applicable, the date on which the consent expires.

(2) In addition to the requirements of subsection (1) of this section, for the purposes of

(a) Section 33.1 (1) (b) of the Act, consent must be done in a manner that specifies

(i) to whom the personal information may be disclosed,

(ii) if practicable, the jurisdiction to which the personal information may be disclosed, and

(iii) the purpose of the disclosure of the personal information.

(3) Subject to subsection (4), a consent under section 33.1 (1) (b) of the Act that was given before the date this regulation comes into force, and is still effective on the date this regulation comes into force, continues to be effective in accordance with its terms.

(4) Unless a consent described in subsection (3) complies with the requirements set out in subsections (1) and (2) (d) within one year after the date this regulation comes into force, the consent ceases to be effective on the date that is one year after the date this regulation comes into force.