



# Privacy Impact Assessment for BC School Districts

## mTransport PIA# 4.1

Name of District:	Nicola-Similkameen Board of Education – SD #58		
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### Part 1 – General

#### 1. Description of the Initiative

##### **mTransport Insight Project Overview**

mTransport is a technological solution dedicated to school transport, which allows drivers to easily monitor the presence of children in their vehicle. mTransport increases student safety and simplifies the daily logistics of all stakeholders: drivers, school officials and parents.

Vehicles are equipped with a tablet or mobile phone with mTransport Driver application. The application displays to drivers their itinerary, as well as the list of children in their vehicle. At each stop, the software allows to register the students boarding on or off.

Information is automatically transmitted to a cloud service which analyzes the data and makes the information available to all stakeholders. mTransport portal users have access to real-time data so that they can act quickly, as well as to reports on past trips that allow them to analyse and optimize transportation. They can also send a notification to parents to inform them of bus delay.

Parents can download the mTransport Parent's Application to their mobile device to receive notifications about their child's transportation and warn of his absence. Parent accounts are tied to a single email address which is loaded into the system. Parents can see only their own child/children attached to that email address at the district office.

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### 2. Scope of this PIA

Our District has entered into a licensed subscription agreement with mPhase Inc. The mTransport pilot project is a 3-year contract agreement from January 6, 2020 to January 5, 2023.

The platform will be accessed by school district employees (drivers and school officials) and by parents of school district students. This PIA addresses the District's responsibilities for the information entered into this system.

### 3. Related Privacy Impact Assessments

It is our understanding that this new project has no current PIAs with the OIPC or BC Ministry of Education.

### 4. Elements of Information or Data

Schools collect personal information on students for the purpose of administering the delivery of education in schools, managing student safety, administering the education system, complying with laws and regulations, conducting research and compiling statistics. This information is collected in the My Education BC system and then data is exchanged between the MyEducation BC system and the mTransport system using FTP. The major information classes stored in the mTransport system include:

- Student data including:
  - Name
  - Gender
  - School ID number
  - Education Level
  - Guardian's Email
  - School
  - Pick Up Stops
  - Drop Off Stops
- Guardian data including:
  - Name
  - Email
  - Telephone (Optional)

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

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### Part 2 – Protection of Personal Information

#### 5. Storage or Access outside Canada

Data remains at all times in Canada. It is transmitted from the school district to mPhase via a sftp service based in Canada, and then is stored with Cloud services based in Canada.

However, anybody with access to mTransport can log into the portal or the apps from outside Canada.

#### 6. Data-linking Initiative\*

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

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#### 7. Common or Integrated Program or Activity\*

In FIPPA, “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);	yes
2. Those services are provided through: (a) a school district and at least one other public body or agency working collaboratively to provide that service; or (b) one school district 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 FIPPA regulation.	No
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

#### 8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Information is collected directly from students and guardians for enrollment/management of the student throughout their time in school.	Collection	26(c)
2.	Information is collected from students during their years in school for the purposes of providing educational services.	Collection	26(c)
3.	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.	Collection	26(c)

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4.	Information is collected from a school from whom the student is transferring.	Collection	26(c); 27(1)(b)
5.	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.	Use	32(a)
6.	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.	Disclosure	33.2(c)
7.	Student information is disclosed to the necessary individuals when a student is ill or injured.	Disclosure	33.1(1)(n); 33.2(a)

### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for unauthorized purposes.	<ul style="list-style-type: none"> <li>District privacy training and refresher training courses (on-line FIPPA training is a condition of employment and renewed each September) on responsibilities for personal information.</li> <li>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.</li> </ul>	Medium	Medium

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2.	Employees have unauthorized access to personal information.	Accounts are created for drivers and administrators by School District staff on a need-to-know basis. Access by drivers and administrators 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. Drivers access the system at the beginning of their bus route using a unique QR code card and the program is closed automatically when the driver arrives at the end of his/her route. If a QR code card is lost or stolen, it can be immediately cancelled by district staff.	Medium	Low

### 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:

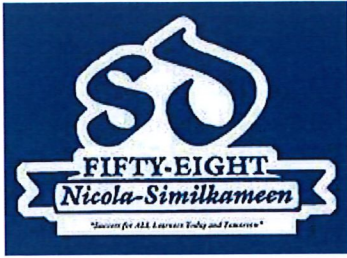
1. The purpose for which the information is being collected
2. The legal authority for collecting it, and
3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

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

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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).**

The bus drivers will use iPads to access the bus route and student manifest. The iPads will be stored in a specially constructed cabinet secured by locks with limited access. Drivers will retrieve their iPad prior to each bus run and return the iPad to the secured cabinet at the end of their route.

If an iPad becomes lost or missing, the Maintenance Clerk will take appropriate measures to replace the device. No program or data is stored in the iPad and so no other procedures are necessary.

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

- User accounts are assigned by the Maintenance Clerk as required for a specific position. The Maintenance Clerk will distribute the login information carefully to those employees who need the information for their position.
- Data is encrypted on the servers.
- Bus stop names have been changed to comply with generic addresses (not student or family names).
- Data collected is the minimum required to run the service. This avoids highly sensitive data like physical addresses. In case of a breach, stolen data would be less valuable.

#### **13. Does your district department rely on any security policies?**

Only the Maintenance Manager and the Maintenance Clerk have access to create, delete or edit drivers' accounts. Accounts are updated immediately when the employment status of a driver changes and they will no longer be able to see information for that account.

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- 14. Please describe any specific policies and procedures and provide contact details for someone who could answer further questions regarding these policies and procedures.**

Darrell Finnigan, District Maintenance Manager, can be reached at [dfinnigan@365.sd58.bc.ca](mailto:dfinnigan@365.sd58.bc.ca) or 250-315-1113 for further clarification of these policies and procedures.

- 15. 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 the MyEducation BC database is accurate. They will ensure that students are accurately assigned to bus routes. When any student leaves or arrives in the district, the school secretary will update the MyEd database to ensure bus route information is correct.

Any discrepancies or errors in the MyEd data will be reported to the Maintenance Clerk by the bus drivers or by the IT department. The Maintenance Clerk will then take steps to ensure the secretary at the related school is notified and trained to prevent future errors.

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

The maintenance clerk will be alerted regarding the hiring or departures of bus drivers. Driver accounts will be immediately updated to reflect current employees only.

### **Part 4 – Accuracy/Correction/Retention of Personal Information**

- 17. 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 school/district notify them of the update, correction or annotation?**

- Personal information is entered, updated and corrected into MyEducation BC by school staff, based upon information provided by students and their parents/guardians and then that information is transferred daily into the mTransport system.
- Parents enter attendance information for students from an online app and then that information is transferred into the mTransport system.

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

Yes. The information in mTransport will help ensure the safety of our bus students. mTransport portal users have access to real-time data so that they can act quickly to locate students. The district can also send a notification to parents to inform them of bus delays or cancellations.

In order to facilitate the creation of student cards and to aid the quick access of student information in case of an emergency, an in-house software program is loaded on the computers of assigned staff (IT personnel, Maintenance Manager, Maintenance Secretary, and designated Maintenance personnel in Princeton).

While this program resides on individual computers, any data used is pulled and stored on the server (refer to Part 2 above).

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

Once information from MyEducation BC is transferred to mTransport, user account protocols apply.

**20. If you answered “yes” to question 18, 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?**

The data transferred to mPhase for the purpose of mTransport will be retained during the school year and erased in July of that year.

SD #58 Policy No: 505.1 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.

### **Part 5 – Further Information**

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

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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).*

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22. 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).*

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23. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FIPPA. Under this same section, this information is required to be published in a public directory.

N/A

### 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 school district will have to complete a PIA Update and submit it to Privacy Office(r). See attached document.

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### Part 7 – Program Area Signatures

\_\_\_\_\_  
Darrell Finnigan  
Maintenance Manager

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Stephen McNiven  
Superintendent

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Barbara Ross  
Secretary Treasurer

\_\_\_\_\_  
Signature

\_\_\_\_\_  
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.***

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