PIA02236 — NovoEd

PIA REVIEW – EXECUTIVE REPORT

PREFACE

This document forms part of UBC Safety and Risk Services (SRS) PrISM's internal documentation for support and administration of the Privacy Impact Assessment (PIA) Review Process. In particular, it documents the final report of the specified PIA review.

This segment serves to provide and record document control capabilities for this document.

Controlled Document

The template and final report documents are controlled documents. The master electronic versions of each reside on the SRS TeamShare S-drive. Any copies or versions not provided directly by the SRS PrISM team, or which have a broken chain of custody, are not to be considered as official copies.

Document Control

The following sub-sections provide a record of the base document template revision history and control.

CONTRIBUTORS

CONTRIBUTOR	DEPARTMENT	POSITION
Bhavraj Ghtaura	Safety and Risk Services	Privacy and Information Security Risk Advisor

Figure 1 - Major Document Revision Approval History

TEMPLATE REVISION HISTORY

REVISION #	DATE	REVISED BY	DESCRIPTION
1.0	2022-04-01	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2022-04-01	Bruce Wiesner	Initial release of document

Figure 3 - Major Document Revision Approval History

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PART 1: GENERAL INFORMATION & OVERVIEW

1.1 Executive Summary

The UBC Sauder School of Business Executive Education unit is currently using the Moodle learning management system (LMS) designed for academic use as a repository for the delivery of electronic materials and content. The user experience provided by this system does not meet Exec Ed's current or future business requirements. As a result, Exec Ed will implement NovoEd, an cloud-based learning management system designed specifically to target professional clients and learners who prefer an executive experience. NovoEd is a platform that allows students to take virtual classes and will not be used as an enrollment and registration system. NovoEd will replace Moodle as the LMS currently in use. Personal information data elements will remain within the existing enrolment and registration system (SITs/Tribal), which will itself be replaced in the coming years.

NovoEd is headquartered in San Francisco, has approximately 60 employees across the USA serving more than 100 clients, comprising over 500,000 users. NovoEd has provided SOC II attestations and significant additional documentation about its security posture. Based on information the the vendor risk assessment questionnaire and documentation provided, as well as publicly available information, NovoEd's security policies, standards, and practices are considered robust, meeting UBC security requirements.

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

The UBC Sauder School of Business (Sauder) Executive Education unit (Exec Ed) is currently using a web-based system, Moodle, to support their virtual learning experience. Moodle has minimally satisfied the requirements of the team and its end users (participants). This Learning Management System is for academic use as a repository for the delivery of electronic materials. It is a student facing system with an academic look and feel and a non-intuitive user interface which often requires participant training. Furthermore, there are no collaboration tools and there is limited capability for third party integration. Participants are industry professionals who are mid-senior level managers or executives.

This system does not meet Exec Ed's business needs given the fact that it is intended for students in University or high school. In addition, the Exec Ed team often has to troubleshoot issues, particularly with administration of the existing platform (i.e. uploading learners, learner access and controls with the platform, content uploads). The current available functionality also lacks the ability for staff to create engaging material and access learning analytics. Due to Moodle's shortcomings, the Exec Ed team has carried out a structured process to select a new Learning Experience Platform capable of providing an immersive, social learning experience for their intended audience. As a result, Exec Ed has experienced a steady decline in revenue since the onset of the pandemic. The unit has not been able to pivot to virtual learning in a meaningful way because the current platform does not allow for an immersive and "executive-like" online experience.

The main goal of this investment is to enhance customer experience by providing a world-class virtual learning experience and increase revenue and market share. Goals and objectives include:

- Create an immersive learning experience for virtual programs enabling the business to remain competitive in the market and expand into new global markets Implement an intuitive and modern consumer grade user interface by providing a professional development look and feel for adult learners.
- Develop a custom digital wrapper for all programs, regardless of delivery method (virtual, hybrid, or in-person) to provide clients with a consistent, world-class experience.
- Able to co-brand for custom clients (employee and employer dashboard experience with measurable analytics).
- Have a system of Engagement for social learning (learner centric, including submission gallery and collaborative feedback tools, virtual cohort-based learning/interaction and networking with peers).
- Include a built-in marketing portal which will enable the unit to generate revenue (i.e. develop and launch on-demand programming, creating evergreen revenue streams).
- Designed to have additional "bolt-on" tools, including learning assessment, collaboration tools, live Zoom sessions etc.
- Show real-time metrics that allow the team to iterate and enhance programming in an effective and efficient manner ensuring programming meets and exceeds client expectations in both the B2C and B2B environments (and also track and share metrics with clients to exemplify ROI of Exec Ed's programming).
- Provide more informative and personalized communications.
- Reduce Exec Ed staff time with development and launch of new programming.

The proposed customer support will also ensure staff time on client troubleshooting is reduced resulting in increased operational efficiencies and enhanced client experience.

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**.

1.3 Scope

The scope of this PIA is the implementation of NovoEd for direct use by UBC faculty, staff and students who are authorized to use the product on behalf of UBC, as outlined in this PIA.

1.4 Data Elements

Personal information to reside with NovoEd includes name, username, email, IP address (geolocation), school name, course history and grades.

Additional personal information such as name, date of birth, gender, employment history, dietary information (if in person) for catering, statistics, targeted marketing will be retained in the SITs (Tribal) registration service, external to NovoEd.

Per the project, no financial information is stored Date of birth is an optional field to understand the average age of a person that may be taking certain programs, and is used to determine offerings. Gender is stored specifically for Sauder's participation in the annual Financial Times rankings of business schools, which required understanding the percentage of participants who are women.

Per its Privacy Policy, NovoEd also claims to be only a processor of personal data working at the behest of the customer. However, NovoEd uses extensive tracking and targeting cookies, as well as the Google Analytics suite of tools for any users interacting with their services, including for targeted and third party marketing content.

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

Any personal information collected will be stored on AWS servers outside of Canada (in the USA). The personal information data elements are not considered to be Sensitive in the context of FIPPA legislation or UBC Information Security Standards, therefore an enhanced PIA was not completed for this initiative.

1.6 Data-Linking Initiative

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

1.7 Is this a Common or Integrated Program or Activity?

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 Diagram / Table
No data flow was provided.

2.2   Risk Mitigation Table
The following table indicates the associated risk levels as applicable and the potential or intended mitigation steps.

Category: Security					
Risk	**Ref#**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Retaining PI longer than necessary	RK0021110	4 - High	3 - Significant	Mitigate	3 – Medium
	Mitigation Plan: The project has committed to keeping records in alignment with UBC policies and standards. The project is recommended to reach out to the UBC Records Management Office for guidance regarding how long to retain records containing personal information.				
Over collection of personal information	RK0021446	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: Personal information collected and inputted into the system will be that which is required for ensuring users can access and participate in teaching and learning activities. The primary data repository for personal information will continue to be the registration service SITs. Although collection of personal information within SITs is out of scope for this PIA, it is recommended that the unit limit the data elements collected to those required for user registration and course management. Data elements such as date of birth are recommended to be removed if age range or similar more ambiguous metrics can fulfill the unit's objectives.				
PI stored / accessible outside of Canada	RK0021028	4 - High	4 - Major	Mitigate	2 - Low
	Mitigation Plan: Personal information may be stored outside of Canada on secure NovoEd servers in the USA. Consent is not required for this purpose.				

Figure 4 - Risk Mitigation Table

2.3   Collection Notice
The project is required to include a standard privacy notification, such as the following:

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 managing your enrolment within the UBC Sauder Executive Education learning management system. Your personal information will be stored on a secure service within the USA. Questions about the collection of this information may be directed to executiveeducation@sauder.ubc.ca.

Consent is not required, however it is recommended to still inform users that their personal information will be stored outside of Canada.

2.4   Consent for Storage/Access Outside of Canada & Opt-Out Procedure (If Any)
Consent is not required as the storage of personal information outside Canada is authorized under 2021 FIPPA amendments.

2.5   Consent Withheld Procedure
Consent withheld procedures are not required as consent is not required.

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PART 3:   SECURITY OF PERSONAL INFORMATION

3.1   Physical Security Measures
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).

3.4   Tracking Access / Access Controls
A limited number of UBC Sauder Executive Education staff will have full access to the NovoEd platform, as required for enrolment and registration purposes. NovoEd technical support staff will have access to assist with troubleshooting.

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 capture personal information that directly affects an individual, including course history and grades, and must be retained for at least one year under s.(31) of FIPPA.

4.3   Records Retention and Disposal
This project is required to comply with UBC Records Management Policies.

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

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PART 6:   ACCESS AND PRIVACY MANAGER COMMENTS

6.1   Information or Materials Reviewed

Overall, the information provided was deemed reasonable to provide an understanding of operating privacy and security controls.

Information Reviewed	Date Received
(NovoEd Response) 2021010083 Schedule B - Security and Privacy Assessment RFP 20210803 Rev0 (1).xlsx	2022-03-17 18:18:35
2021010083 Executive Learner Experience Platform RFP 20210803 Rev0.pdf	2022-02-18 02:25:18
2021010083_Executive Learner Experience_CON_20210204_RevB.docx	2022-02-18 02:25:19
Acceptable Use Policy.pdf	2022-03-17 18:18:35
Access Management Policy.pdf	2022-03-17 18:18:34
BSR - NovoEd - 2022-02-04.pdf	2022-02-07 19:44:06
Business Continuity Plan Policy.pdf	2022-03-17 18:18:35
Change Management Process.pdf	2022-03-17 18:18:35
Data Management Policy.pdf	2022-03-17 18:18:35
Disaster Recovery Plan.pdf	2022-03-17 18:18:35
Incident Response Policy.pdf	2022-03-17 18:18:35
Information Security Policy (pre-formatting).docx.pd	2022-03-17 18:18:35
Infrastructure Hardening Requirements.pdf	2022-03-17 18:18:35
IT Recovery Plan.pdf	2022-03-17 18:18:35
ITGC - Sauder ExecEd LXP Final Submission to ITGC_16Feb2022.pdf	2022-02-17 18:27:59
Logging, Data Retention & Disposal Policy.pdf	2022-03-17 18:18:35
NovoEd Busienss Case 3.0.docx	2022-02-18 02:25:18
NovoEd Cookie Policy - NovoEd.pdf	2022-03-18 15:24:42
NovoEd Data Processing Addendum.pdf	2022-03-18 15:24:42
NovoEd Response.pdf	2022-02-18 02:25:21
NovoEd Service Processors and Subprocessors.pdf	2022-02-18 02:25:18
NovoEd SOC 2 Type I Report 2020.pdf	2022-02-18 02:25:20
NovoEd SOC 2 Type II Report 2021.pdf	2022-02-18 02:25:20
NovoEd-Learner_Profile.png	2022-02-18 02:25:19
NovoEd_Functional_Architecture_Diagram (2).pdf	2022-02-18 02:25:19
NovoEd_Functional_Architecture_Diagram.pdf	2022-03-17 18:18:36
Privacy Policy - NovoEd.pdf	2022-03-18 15:24:42
Terms of Service - NovoEd.pdf	2022-03-18 15:24:42
User Privacy Policy – NovoEd Help.pdf	2022-03-18 15:24:42

6.2 Analysis and Findings

The information provided for the review has established that this project and associated use-case, as presented, may proceed in the proposed manner. Based on the information provided, our review has concluded that there are no significant privacy or information security risks introduced by this project. We do, however, recommend the project ensure that it continues to fully comply with the FIPPA legislation and the UBC Information Security Standards.

6.3 Conditions of Approval

- Completion of Implementation Checklist (hXXps://riskmanagement.sites.olt.ubc.ca/files/2018/12/Implementation-Checklist.xlsx)
- Registration of any APIs used with UBC IT Enterprise Data Governance.

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
Bruce Wiesner

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

Distributed To
Requestor: Bhavraj Ghtaura, Associate Director, Business Applications **Project Manager:** Bhavraj Ghtaura, Associate Director, Business Applications **Owner:** Bruce Wiesner, Associate Dean, Executive Education **Risk Advisor:** Christian Stockman, Information Security Risk Advisor

PIA Request History:

Information Reviewed	Date Received
2022-01-11 15:15:43	2022-04-01 20:59:01