PRELIMINARY ANALYSIS QUESTIONNAIRE

1. PROJECT INFORMATION

PROJECT TITLE	TVDSB Every Student Belongs Survey (Student Census)
INSTITUTION	Thames Valley District School Board
DEPARTMENT	Research & Assessment Services / Equity Portfolio
PROJECT LEADS	Christine Stager, Sarah Folino, Lori Kirkpatrick

2. PROJECT DESCRIPTION

Briefly describe the project noting the program, system, application or activity that is the subject of the PIA including its purpose, scope and key objectives.

TVDSB will conduct the "Every Student Belongs Survey" to gather information about our students' backgrounds. All students in Grades 7-12 and parents/guardians of all students in Kindergarten to Grade 6 will be asked to complete a survey containing questions about their identity (students) or their child's identity (parents/guardians). The data gathered through the survey responses will be used to affirm and better understand the identities of our students, inform Board decision-making and policy development, understand potential inequities in outcomes for particular groups of students, and ensure equitable and inclusive learning environments for our students.

The Ontario Ministry of Education has directed all school boards to conduct a student census as one step towards achieving equitable and inclusive education for all. Specifically, the Ministry has directed that school boards engage in this data collection and analysis to ensure representative, equitable and healthy learning environments. The Ministry has specified that data will be collected on a voluntary basis and in accordance with laws governing privacy and confidentiality.

Section 13.0 of the TVDSB's Privacy and the Management of Personal Information Procedure (2014b) states that all staff responsible for developing, implementing and/or managing projects are to complete a Privacy Impact Assessment (PIA) to identify and mitigate any privacy-related concerns and the actual or potential risks that a project may have on the use of individual's personal information. The Procedure's requirement that a PIA be conducted during project design ensures that personal information is managed safely, securely and responsibly and ensures compliance with the *Municipal Freedom of Information and Protection of Privacy Act* (*MFIPPA*).

The Information and Privacy Commissioner (IPC) is the regulatory authority with respect to privacy and access law and regulation in Ontario. The IPC directs organizations to complete a preliminary analysis of data collection projects to determine whether a PIA is recommended or required in order to ensure compliance with provincial privacy laws. It is anticipated that conducting a preliminary analysis will also assist school boards in responding to questions or concerns raised by stakeholders and the public about privacy and confidentiality in relation to the "Every Student Belongs Survey".

3. COLLECTION, USE AND DISCLOSURE

3.1 Identify the kinds of information involved in the project (check all that apply).

	YES	NO	UNKNOWN
Information about individuals in their personal capacity	X		
Information about individuals acting in their business, professional or official capacity, for example, name, job title, and business contact information		X	
Information about institutions, for example, for profit and not-for-profit institutions and government institutions		X	
Aggregated, anonymized or de-identified information. Outline below the process followed to aggregate, anonymize or de-identify the information and whether it is possible to identify/re-identify individuals from that information	X		

Respondents will answer questions about themselves only.

Students and parents/guardians will receive an email invitation to complete the survey. The survey will be accessed through a unique identifiable link contained within their secure email account. Respondents will not be directly asked to identify themselves or their child on the survey but their survey will be linked to student identification numbers.

As part of the survey questionnaire, respondents will be asked to provide some identifying information (e.g., school, grade, racial identity, disability, etc.), however, any group(s) small enough to result in a risk of identification (i.e. less than 10 responses) will be included within larger groups for reporting/sharing purposes. Identifying information, including student identification numbers and email addresses, will be stored within the raw data that will only be accessible by Research and Assessment staff supporting the project. Data will be stored on the password-protected server in Research and Assessment Services.

Survey software (Qualtrics) routinely used within the TVDSB Research and Assessment department will be used to collect survey responses. IP addresses of respondents will not be retained. Student identification numbers and email addresses will be uploaded to the Qualtrics survey but will not include student names. Qualtrics has provided comprehensive privacy and security statements and procedures to ensure that this information is securely stored. Qualtrics privacy information can be found on their website: www.qualtrics.com.

3.2 Identify the kinds of personal information that will be collected, used, retained, disclosed, secured and disposed of (check all that apply).

	COLLECT	USE	RETAIN	DISCLOSE	SECURE	DISPOSE
List the types of **personal information** involved in the project and indicate in the columns on the right whether this personal information will be collected, used, disclosed, retained, secured or disposed of by TVDSB.						
Student identification number and email addresses	X	X	X		X	X
Identity-based information (i.e., school name, grade, learning program, IEP and exceptionality, language, indigenous status, ethnicity, race, immigration status, religion, gender, sexual orientation, disability status, parent SES)	X	X	X	X	X	X
If third parties will be involved in the project, note the types of information they may be collecting, using, disclosing, retaining, securing, or disposing.						
Student Identification Number and email addresses - Qualtrics			X		X	X
Identity-based information (i.e., school name, grade, learning program, IEP and exceptionality, language, indigenous status, ethnicity, race, immigration status, religion, gender, sexual orientation, disability status, parent SES) - Qualtrics			X		X	X
List each element of non-personal information that, when combined or linked, **may** enable identification of an individual, and indicate in the columns on the right whether that information will be collected, used, disclosed, retained, secured or disposed of.						
No personal information						
Unknown at this time (Please explain why in row below.)						

3.3 **To whom does the personal information relate?** List all the individuals whose personal information will be involved in the project, that is, the data subjects.

All TVDSB students in Grades 7-12 who participate in the survey and their families, all TVDSB parents/guardians of students in Kindergarten to Grade 6 who participate in the survey and their families.

4. PRIVACY LEGISLATION

4.1 Identify applicable privacy legislation (check all that apply).

	YES	NO	UNKNOWN
Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)	X		
Personal Health Information Protection Act (PHIPA)		X	

5. CONCLUSION

Indicate whether or not you will proceed with the PIA process and the reasons for your decision.

It has been determined that a PIA is necessary, given that the Every Student Belongs Survey will involve the collection of personal information about **identifiable** individuals within the meaning contemplated by MFIPPA as the survey will **not** be completed anonymously:

Interpretation

2 (1) In this Act,

"personal information" means recorded information about an identifiable individual, including,

(a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,

(b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,

(c) any identifying number, symbol or other particular assigned to the individual,

(d) the address, telephone number, fingerprints or blood type of the individual,

(e) the personal opinions or views of the individual except if they relate to another individual,

(f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,

(g) the views or opinions of another individual about the individual, and

(h) the individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual; ("renseignements personnels")

PROJECT ANALYSIS QUESTIONNAIRE

1. SCOPE OF PIA

Define the scope of the PIA review and analysis, that is, what aspects of the project are in and out of scope.

The preliminary analysis has included all aspects of the project, including the anticipated content of survey questions and the methodology for administering the survey and reporting/sharing the data received from respondents.

Non-data focused aspects of the project were not included in the preliminary analysis, as they were not considered to have privacy implications – for example, the Communication Plan and strategies to garner the support of our community and maximize the survey response rate.

2. PROJECT AUTHORITY

Describe the regulatory and legal framework for the project (for example, applicable legislation and regulations, bylaws, memoranda of understandings, agreements, contracts and other relevant instruments).

TVDSB is committed to the appropriate collection, use, retention and disclosure of personal information in compliance with all applicable professions of the *Education Act*, *Municipal Freedom of Information Act* (*MFIPPA*), the *Personal Information and Protection of Electronic Documents Act*, and any accompanying regulations. The Board's policies and procedures with respect to privacy and records and information management, support the application of relevant legislation and regulations by the Board.

The purpose of this preliminary analysis is to demonstrate compliance with relevant legislation and regulations, policies and procedures of the Every Student Belongs Survey project. Our preliminary analysis indicates that the project does collect personal information within the meaning of *MFIPPA* and therefore all procedures related to the project will be in compliance with MFIPPA.

It is acknowledged that the respective Collective Agreements and/or Memoranda of Agreement of all TVDSB employee groups also form part of the legal and regulatory framework of the project.

3. PROJECT CHARACTERISTICS

3.1 Identify key characteristics of the project (check all that apply).

	YES	NO	UNKNOWN
Involves creating a <u>new</u> program, process, service, technology, information system or other type of IT application		X	
Involves a <u>change</u> to an existing program, process, service, technology, information system or other type of IT application		X	
Involves procuring goods or services		X	
Involves outsourcing or contracting for services related to the collection, use, disclosure, processing, retention, storage, security or disposal of personal information	X		

	YES	NO	UNKNOWN
Involves developing a request for bids, proposals or services		X	
Involves a process, system or technology for which the privacy risks are not known or well documented		X	
Involves creating an information system or database containing personal information, and/or the matching, merging, combining or centralizing of databases		X	
Involves information sharing (internal and external)	X		
Involves the need to identify, authenticate or authorize users – public and/or internal staff	X		
Other activities that may impact privacy. (Please explain below.)		X	
Storing identifiable data internally and externally within the Qualtrics software.			

3.2 If you answered yes to any of the above, explain the identified process or activity. Attach all relevant documentation to your completed Project Analysis Questionnaire.

Qualtrics survey software will be used to distribute the survey and collect data from participants. Student identification numbers and email addresses will be uploaded to Qualtrics in order to set up automated emails to participants. No other identifying information (e.g., student or parent name) will be included. Aggregated data collected by the Every Student Belongs Survey will be shared, in varying levels of detail, with TVDSB students, families, staff, and the general public. No identifying information will be shared with anyone outside of the Research and Assessment Services team who will be conducting the analyses.

3.3   Identify any changes that will result from the project (check all that apply).

	YES	NO	UNKNOWN
Involves a change in users (internal and external) of a related process or system		X	
Involves a change in partners or service providers (internal and external)		X	
Involves a change in the amount, type of or ways that personal information is collected, used, disclosed, retained, secured or disposed of		X	
Involves a change to the purposes for which personal information will be collected, used or disclosed		X	
Involves a change from direct to indirect collection of personal information		X	
Involves a change in roles and responsibilities, that is, who can do what, when, where, why and how with personal information		X	
Involves a change to, or elimination of, existing practices of anonymizing or de-identifying information		X	

Involves a change in the process or technology used to collect, use, disclose, retain, secure or dispose of personal information, for example, hardware and software		X	
Involves a change to an information system or database containing personal information		X	
Involves a change of medium or service delivery channels, for example, the automation of manual process, conversion from paper to electronic records or the, creation of a new website to provide services to clients		X	
Involves a change in the security requirements or measures		X	
Other (Specify change or proposed change below.)		X	

3.4   If you answered yes to any of the above, explain the change, that is, what specifically will change and why it is necessary.

Document any additional business processes. Business processes refer to the various activities that will be completed following implementation of the project. These can include anything from technical processes (such as data processing) to administrative functions (such as reviewing applications, filing and archiving).

Attach all relevant documentation to your completed Project Analysis Questionnaire.

N/A

4. TECHNOLOGY

4.1 Identify technology-related characteristics of the project (check all that apply)**.**

	YES	NO	UNKNOWN
Involves technology designed to monitor, track or observe an individual or their transactions, for example, video cameras, cell phones and geospatial or location-based services.		X	
Involves logging information, usage or preferences, for example, IP addresses, traffic data, access or transaction logs, cookies, or other mechanisms for recording an individual's use of technology.		X	
Involves public-facing Internet communications, services or transactions, including websites, blogs, forums, bulletin boards, or social media.	X		
Involves using analytics or performance measurements, for example, web analytics, social media analytics, or business intelligence tools.		X	
Involves processing or storing of personal information in a virtual environment, for example, cloud computing.	X		
Involves acquiring, or customizing, commercial software, hardware or IT support services by external vendors.	X		
Involves developing, or customizing, software, hardware or IT support services		X	

"in-house".			
Involves creating information systems or other types of IT applications that will be populated by others, for example, clients of system or service will supply information.		X	
Involves a system or application that will automatically collect, use, disclose or retain personal information.	X		
Other (Please explain below.)		X	

4.2 If you answered yes to any of the above, provide an explanation of the technology (what is its purpose, who is using it, and how is it used). Are there any privacy implications?

The survey will be designed using Qualtrics software, which has been purchased by the Board for use by the Research and Assessment Team and has been used historically for other survey/data collection activities. Qualtrics will be used to distribute the survey and collect data from participants. Student identification numbers and email addresses will be uploaded to Qualtrics in order to set up automated emails to participants. Participants will receive their unique link in their email and will be able to access the survey by clicking on the link contained in their secure email account. No other identifying information (e.g., student or parent name) will be uploaded to Qualtrics or sent my email. General information about the survey will be posted on the TVDSB external website and TVDSB social media channels but will not include any links to participants or identifying information. The survey data will be securely stored in a password protected and secure cloud location within Microsoft Sharepoint.

5. ROLES AND RESPONSIBILITIES

5.1 List other institutions or other third parties involved in developing or implementing the project and describe their role.

INSTITUTION/THIRD PARTY	PROJECT ROLE
N/A	

5.2 List all institutions or other third parties that will collect, use/process, retain, store, disclose secure or dispose of personal information <u>on behalf</u> of your institution.

INSTITUTION/THIRD PARTY	RELATIONSHIP TO INSTITUTION	PROJECT ROLE
Qualtrics	TVDSB is an account holder with Qualtrics	Qualtrics will retain and store survey data within the secure Qualtrics software.

5.3 Identify any location outside of Ontario where personal information may be retained or stored and the third parties involved.

PERSONAL INFORMATION	LOCATION	THIRD PARTY
Student identification numbers, email addresses, other identity information as collected on the survey (e.g., ethnicity, language, disability, gender)	United States	Qualtrics

5.4 List all parties that will have access to, or use, the personal information, for example, other program areas, IT staff, legal counsel, etc.

PARTY	RELATIONSHIP TO PROJECT	PROJECT ROLE
TVDSB Research & Assessment Services	Project Leads	Survey development, promotion, administration, and data analysis and reporting

5.5 Identify how other institutions or third parties will be bound to follow relevant privacy and security requirements (check all that apply).

	NAME OF INSTITUTION OR THIRD PARTY	IN PLACE	BEING DEVELOPED	UNKNOWN
Contracts	Qualtrics	X		
Memoranda of Understanding				
Agreements (service level and trade)				
Other (Please explain below.)				

6. RELEVANT INFORMATION

Document the information that will be collected, accessed, used, retained, disclosed secured or disposed of. Identify all the types of records (existing and proposed, paper and electronic). Identify any sensitive personal information.

The information proposed to be collected will consist of survey responses, primarily in electronic format, to questions anticipated to touch on subject areas with respect to the individual respondent including, but not limited to: language, ethnicity, race, gender identity, sexual orientation, religion, and socioeconomic status.

The information, because it is linked to individual students, does constitute personal information. It is acknowledged that questions eliciting information specific to the respondent relating to any of the areas identified above may be perceived as personal and sensitive. It is intended that the project communication, together with information provided to respondents with respect to confidentiality, will assist in addressing any resulting privacy-related concerns on the part of respondents and other stakeholders. All data, including identifying information, will be securely stored and will remain confidential with limited access to only staff in Research and Assessment Services.

7. PERSONAL INFORMATION FLOWS

7.1   Document, in detail, the lifecycle of the personal information involved in the project.

Personal Information	Collected	Used	Retained/Secured	Disclosed
	By? From? How? When? Where? Why?	By? How? When? Where? Why?	By? How? How long? Where? Why?	By? To? How? When? Where? Why?
Student Identification Numbers and Email Addresses	**By**: TVDSB **From**: Families **How**: Student Registration **When**: Time of Registration **Where**: Online or on paper registration form **Why**: For the purpose of registering at a TVDSB school	**By**: R&A **How**: To administer survey to participants through Qualtrics **When**: December 2020 **Where**: In emails sent to participants **Why**: For the purpose of linking survey responses to other student information	**By**: R&A, Qualtrics **How**: Password protected and secure cloud location **How long**: During survey administration and analysis **Where**: Qualtrics server and Microsoft Sharepoint **Why**: To administer survey and link responses to other student information	**By**: N/A **To**: N/A **How**: N/A **When**: N/A **Where**: N/A **Why**: N/A
Identity-based data (e.g., ethnicity, gender, religion)	**By**: Research & Assessment **From**: Students and Families How: Online survey **When**: December 2020 **Where**: In school, at home **Why**: To learn more about our students	**By**: R&A, TVDSB **How**: To affirm student identities and to inform policies and practices. **When**: 2021-2022 school year **Where**: TVDSB **Why**: For the purpose of better understanding our students and creating more equitable and inclusive learning environments.	**By**: R&A, Qualtrics **How**: Password protected and secure cloud location **How long**: Until data analysis is complete **Where**: Qualtrics server and Microsoft Sharepoint **Why**: To analyse data and summarize and share survey results	**By**: N/A **To**: N/A **How**: N/A **When**: N/A **Where**: N/A **Why**: N/A