

STP Data Access Policy

The purpose of the Student Transition Project (STP) is to advance knowledge and understanding of how students transition or move from kindergarten to Grade 12 (K-12) into and through post-secondary education institutions, in order to better inform policy and decision-making for secondary and post-secondary education systems.

The purpose of the STP Data Access Policy is to guide the STP Steering Committee in making decisions about requests from individuals or organizations seeking access to the data collected and linked under the project. The Steering Committee, in consultation with the privacy advisor for the British Columbia education ministries, must determine the conditions under which authorized users may be granted access to the data (this includes aggregate data without masking applied - as defined in section 3.1 of the STP Information Sharing Agreement (ISA): http://www.aved.gov.bc.ca/student_transitions/documents/infoshare_agreement.pdf.

Requests from individuals or organizations to link STP data with another data set are considered under the STP Data Linkage Policy:

http://www.aved.gov.bc.ca/student_transitions/documents/DataLinkagePolicy.pdf

Applications to access STP data should be sent to:

Email: Christine.Broda@gov.bc.ca

Mailing Address: PO Box 9154 Stn Prov Govt
Victoria BC V8W 9H1

Data requests from academic researchers are subject to STP resources and capacity. In all cases, only the minimum data needed to answer a research question will be provided.

This policy recognizes different categories of users. Prior to receiving data access, users must sign the confidentiality agreement posted at:

http://www.aved.gov.bc.ca/student_transitions/information_sharing.htm). Any breach in privacy protocols will be addressed in accordance with Appendix 1 of the STP ISA.

All users are required to follow the STP Data Use and Reporting Protocol posted at:

http://www.aved.gov.bc.ca/student_transitions/documents/reporting_protocol.pdf

Data Custodian: The highest level of access is given to the Data Custodian. The Data Custodian is the organizational unit in Ministry of Education (MED), as designated by the Steering Committee established under section 5.3 of the ISA, responsible for receiving, anonymizing, and aggregating the personal information disclosed by the Parties. The Data Custodian has read/write access to case-level, identifiable data. Only a limited number of individuals requiring access to the data to fulfill their duties and responsibilities will have access to the data.

Authorized User Level 1: Users in this group have ongoing read-only access to all case-level identifiable data submitted for inclusion in the STP Database. Authorized Users Level 1 include STP staff/employees carrying out data quality assurance checks and approved STP projects as specified in the STP work plan.

Authorized User Level 2: Users in this group have ongoing or time-limited access to anonymized case-level STP data. Authorized Users Level 2 are granted read-only access to the minimum amount of data required to complete the approved project. This group includes STP Steering Committee members and staff supporting committee members in carrying out approved STP projects specified in the STP work plan. Under exceptional circumstances, contractors working on behalf of the STP Steering Committee may be considered Authorized Users Level 2 for this purpose.

Authorized User Level 3: Users in this group have ongoing read-only access to aggregated STP data, typically in the form of Excel pivot tables. Authorized Users Level 3 may also access case-level, identifiable data for their own institution, for the purpose of conducting research to support program evaluation and accountability reporting. Level 3 users include employees in institutional research/registrar/data and reporting departments of the organizations represented by the STP Steering Committee; consortia of STP-participating institutions; BC school districts and any other group or person designated by the Steering Committee as an Authorized User Level 3. The number of Level 3 users is typically restricted to five per organization. These individuals must sign the following confidentiality agreement:

http://www.aved.gov.bc.ca/student_transitions/documents/ConfidentialityAgreement.pdf

Contractors working on behalf of an institution or consortium may be granted access for a time-limited period. These individuals must sign the STP research agreement (Appendix 4 of the ISA): http://www.aved.gov.bc.ca/student_transitions/documents/STPISA-Jan2010.pdf .

Authorized users at institutions are responsible for ensuring that their contractors follow the terms and conditions regarding confidentiality, data use and publication outlined in the STP research agreement and STP Data Use and Reporting Protocol.

Academic Researcher: Academic researchers are members of academic institutions that have ethics committees or boards that approve research projects. Academic researchers may be granted read-only access to STP data through research agreements that are consistent with Section 35 of FOIPPA, which allows disclosure for research or statistical purposes provided that the researcher has obtained an approved ethics certificate and that the proposed research is consistent with the purpose of STP.

Academic researchers must submit a written proposal that articulates the research question that will be answered using the data. Only those requests that do not duplicate the research and analysis being undertaken or under consideration by the STP Steering Committee will be considered.

General Public: The general public refers to all other users. The general public may obtain access to aggregated and masked data published in reports or tables posted on the STP website. Typically this data is provided in reports produced under the direction of the STP Steering Committee.

Levels of Access to STP Data

	Data Custodian	Authorized User Level 1	Authorized User Level 2	Authorized User Level 3	Academic Researcher	General Public
Example of Users	Ministry of Education employees supporting STP	STP Manager and Central Data Warehouse (CDW) Coordinator	STP Steering Committee and STP Contractors	Organizations represented by STP Steering Committee, Consortia of STP-participating institutions, and BC School Districts	Researchers from academic institutions with ethics approval	Students, media; other researchers and stakeholders
Access Duration	Ongoing	Ongoing	Ongoing STP Contractors Time-Limited	Ongoing Contractors Time-Limited	Time-Limited	Ongoing
Purpose	Receiving, anonymizing and merging source data	Submitting source data; conducting data quality checks and STP-approved projects	Carrying out STP-approved projects	Conducting research and analysis to inform institution/ school district/ government planning and policy	Answering research questions on student transitions	Gathering information on student transitions and completion in BC
Original K-12 Source Data	Yes	Yes	No	No	No	No
Original Post-Secondary Source Data	Yes	Yes	No	No	No	No
Case-level, Identifiable Data*	Yes	Yes Read-Only Access	No	Yes (For own institution)	RA	No
Case-level Anonymized data*	Yes	Yes	Yes STP Contractors (under exceptional circumstances)	Yes (For own institution)	RA	No
Aggregated Data (pivots)	Yes	Yes	Yes	Yes Contractors sign Appendix 4	RA	No
Aggregated and Masked Data (reports)	Yes N/A	Yes N/A	Yes N/A	Yes N/A	Yes N/A	Yes N/A

LEGEND:

Yes = Access permitted upon approval by STP SC, in consultation with ministry privacy office and upon receipt of appropriate Appendix of the ISA, signed by the user. **Appendix 2 applies in all cases where access is permitted, except where otherwise noted or not applicable (N/A).**

RA = Restricted to Research Agreements vetted by STP SC and signed by the appropriate ministry.

No = No access allowed.

N/A = No agreement required.

* In some cases, the Steering Committee may provide case level data for the purpose of data linkage. Please refer to the STP Data Linkage Policy.

The Steering Committee will review and update this policy annually.

GLOSSARY

Case-level identifiable – means the lowest level of data collected, including personal information with personal identifiers that have not been encrypted. This data exists for a time-limited period in order to match records.

Case-level anonymized – means the lowest level of data where the personal identifiers, such as PEN, are removed and replaced with an encrypted number to protect the privacy of individuals.

Aggregated (pivots) – means K-12 and post-secondary student information that have been combined without personal identifiers for categorical or summary analysis. Aggregate data with encrypted personal identifiers is typically made available to authorized users in Excel pivot tables.

Masked (reports) – means suppressing small cell counts such that individuals cannot be reasonably identified, in accordance with Ministry of Education policy:

http://www.bced.gov.bc.ca/policy/policies/persinfo_foi_smallpop.htm

Appendix 2 – applies to staff/employees and researchers who request access to STP data to accomplish work on behalf of one of the organizations represented on the STP Steering Committee. The appendix is intended to articulate the responsibilities of the user including confidentiality, data use, and publication.

Appendix 4 – applies to contractors or non-employees who wish to obtain access to aggregated STP data, typically in the form of Excel pivot tables. The term will be decided by the STP Steering Committee. The appendix is intended to articulate the responsibilities of the user including confidentiality, data use, and publication.

RELEVANT LEGISLATION

FOI Act Section 35 – refers to disclosure of personal information / data for research or statistical purposes and applies only if:

- (a) the research purpose cannot reasonably be accomplished unless that information is provided in individually identifiable form or the research purpose has been approved by the commissioner,

- (a.1) the information is disclosed on condition that it not be used for the purpose of contacting a person to participate in the research,
- (b) any record linkage is not harmful to the individuals that information is about and the benefits to be derived from the record linkage are clearly in the public interest,
- (c) the head of the public body concerned has approved conditions relating to the following:
 - (i) security and confidentiality;
 - (ii) the removal or destruction of individual identifiers at the earliest reasonable time;
 - (iii) the prohibition of any subsequent use or disclosure of that information in individually identifiable form without the express authorization of that public body, and
- (d) the person to whom that information is disclosed has signed an agreement to comply with the approved conditions, this Act and any of the public body's policies and procedures relating to the confidentiality of personal information.