

Student Transitions Project Data Access Policy

The purpose of the Student Transition Project (STP) is to advance knowledge and understanding of how students transition from kindergarten to Grade 12 (K-12) into and through post-secondary education institutions, 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 as defined in section 3.1 of the [STP Information Sharing Agreement](#) (ISA).

Requests from individuals or organizations to link STP data with another data set are considered under the [STP Data-Linkage Policy](#).

Applications to access STP data should be sent to:

Email: [STP Secretariat](#)

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 a data access and use agreement; users will be required to re-sign the agreement every three years. Any person accessing the STP data, including via saved files on a local LAN, is considered a 'user' and must sign a data access and use agreement (or research agreement if applicable) in accordance with data access and privacy requirements. 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](#).

Data Steward: The highest level of access is given to the Data Steward. The Data Steward is the organizational unit designated by the STP 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 Steward has read/write access to 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. In addition, these users are expected to sign the ministry responsible for K-12 education's data access agreement, which includes provisions for access to the STP database.

Authorized User Level 1: Users in this group have ongoing read-only access to all 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, read-only access to anonymized data. Authorized Users Level 2 may also access identifiable data for their own institution, for conducting research to support program evaluation and accountability reporting on Aboriginal students. Level 2 users include STP Steering Committee members and staff carrying out approved STP projects. This group also includes 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 2. The number of Level 2 users is typically restricted to five per organization. Requests for more than five users will be considered if the organization provides sufficient rationale for why increased access is required. If the total number of users at an organization exceeds eight, that organization is expected to have a supervisory structure that provides oversight on data use, tech support and reporting requirements for less experienced users (for example, this may involve a senior member of the institutional research team who supervises the work of junior analysts). Authorized Users Level 2 must sign a data access and use agreement.

Contractors working on behalf of an institution or consortium may be granted access for a time-limited period. These individuals must sign an STP research agreement. 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 the *Freedom of Information and Protection of Privacy Act* (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 questions 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 public may obtain access to aggregated and masked data published in reports or tables posted on the STP website. This data is provided in reports produced under the direction of the STP Steering Committee.

Levels of Access to STP Data

	Data Steward	Authorized User Level 1	Authorized User Level 2	Academic Researcher	General Public
Example of Users	Ministry responsible for K-12 education's employees and contractors supporting STP	STP Manager and Central Data Warehouse (CDW) Coordinators	STP Steering Committee and contractors; Organizations represented by STP Steering Committee, Consortia of STP-participating institutions.	Researchers from academic institutions with ethics approval	Students, media; other researchers and stakeholders
Access Duration	Ongoing	Ongoing	Ongoing STP Contractors Time-Limited	Time-Limited	Ongoing
Purpose	Database administration Receiving, anonymizing and aggregating source data	Submitting source data; conducting data quality checks and STP-approved projects	Carrying out STP-approved projects Conducting research to inform planning and policy Accountability reporting on Aboriginal students (identifiable data)	Answering research questions on student transitions	Gathering information on student transitions and completion in BC
Original K-12 Source Data	Yes (EDUC access agreement)	Yes	No	No	No
Original Post-Secondary Source Data	Yes (EDUC access agreement)	Yes	No	No	No
Identifiable Data*	Yes (EDUC access agreement)	Yes Read-Only Access	Yes (For own institution)	RA	No
Anonymized data* (pivots)	Yes	Yes	Yes STP Contractors	RA	No
Aggregated Data	Yes	Yes	Yes	RA	No
Aggregated and Masked Data (reports)	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 (Data Access and Use Agreement) 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 ministries.

No = No access allowed.

N/A = No agreement required.

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

GLOSSARY

Aggregated – means K-12 and post-secondary student information records that have been combined such that the combined data reflects the attributes of a group rather than an individual.

Appendix 2 (Data Access and Use Agreement) – 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 (Research Agreement) – 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.

Anonymized – means the lowest level of data where personal identifiers encrypted to protect the privacy of individuals. Anonymized data is typically made available to authorized users in Excel pivot tables.

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

Masked (reports) – means suppressing small cell counts such that individuals cannot be reasonably identified, in accordance with the ministry responsible for K-12 education's policy:
<https://www2.gov.bc.ca/gov/content/education-training/k-12/administration/legislation-policy/public-schools/protection-of-personal-information-when-reporting-on-small-populations>

STP data – means the combined K-12 and post-secondary data.

RELEVANT LEGISLATION

FOIPPA Section 35 - disclosure of personal information for research or statistical purposes:

35(1) A public body may disclose personal information in its custody or under its control for a research purpose, including statistical research, 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) subject to subsection (2), 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 data linking is not harmful to the individuals that information is about and the benefits to be derived from the data linking 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.
- (2) Subsection (1) (a.1) does not apply in respect of research in relation to health issues if the commissioner approves
 - (a) the research purpose,
 - (b) the use of disclosed information for the purpose of contacting a person to participate in the research, and
 - (c) the manner in which contact is to be made, including the information to be made available to persons contacted.