OSIT / ORC

Privacy, Data and Security Practices

Online Skills Inventory Tool / Outil de reconnaissance des compétences

Organization	CESBA
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This document describes the standard privacy, data-handling and security practices for the OSIT and ORC services provided by CESBA.

1. About OSIT and ORC

The Online Skills Inventory Tool (OSIT) and its French-language equivalent, ORC, are online assessment tools provided by CESBA to participating organizations.

The tools allow learners to complete a series of literacy and numeracy questions. Authorized staff at the learner's participating organization review the responses and work with the learner to identify appropriate learning supports.

Learners do not require an OSIT/ORC account to complete an assessment.

OSIT and ORC are intended as assessment tools. They are not intended to be permanent learner-record systems.

2. Roles and responsibilities

Information submitted through OSIT/ORC remains under the control of the participating organization responsible for the learner. CESBA operates and maintains OSIT/ORC on behalf of participating organizations and does not claim ownership of learner information.

Participating organizations are responsible for determining their authority to collect and use learner information and for meeting their obligations under applicable privacy, education, records-management and other legislation.

CESBA is responsible for operating and securing the OSIT/ORC service and for the technical and administrative safeguards described in this document.

3. Information collected

OSIT/ORC may collect:

- learner name;
- learner email address;
- participating school board or organization;
- responses to literacy and numeracy assessment questions;
- free-form written assessment responses;
- assessment results;
- assessor comments and recommendations; and
- limited technical information required to operate, secure and troubleshoot the service.

Some assessment questions permit free-form answers. Learners are prompted to provide only information relevant to answering the question.

Information not required

OSIT/ORC does not require a learner's date of birth. Earlier versions collected date of birth to help distinguish learners with similar names. CESBA determined that full date of birth was not necessary for assessment or program delivery. Collection has been removed and active historical date-of-birth data has also been removed.

OSIT/ORC does not collect government identification numbers, financial information or health records.

4. Why information is collected

Learner information is used to:

- identify an assessment;
- allow an authorized assessor to review the learner's responses;
- assess the learner's current literacy and numeracy skills;
- allow an assessor to contact the learner using the supplied email address;
- record assessment results, comments and recommendations;
- help participating organizations identify appropriate supports for the learner; and
- operate, maintain and secure the service.

CESBA does not sell learner information. CESBA does not use OSIT/ORC learner information for advertising or unrelated profiling. CESBA does not use learner assessment information for unrelated research, benchmarking or commercial purposes.

5. Access to information

OSIT/ORC uses role-based access.

Assessors

Assessors may access assessment records assigned to their participating organization.

Get SET Administrators

Get SET Administrators manage assessor access for their participating organization and are restricted to their organization's learner information.

CESBA Administrators

A limited number of authorized CESBA administrative and program staff may access information across participating organizations where necessary to administer the service, provide technical or program support, investigate security or privacy issues, manage data retention and deletion, or perform other authorized service-administration functions.

CESBA grants Get SET Administrator access. Participating organizations manage their own Assessors.

OSIT/ORC enforces participating-organization boundaries on the server. An authenticated Assessor or Get SET Administrator is not authorized to retrieve or modify another organization's learner assessments by manipulating assessment identifiers or URLs.

6. Authentication and account security

CESBA administrative accounts use multi-factor authentication.

CESBA is extending multi-factor authentication to GET SET Administrator and Assessor accounts through a phased implementation intended to provide appropriate user support and account-recovery procedures. This will be fully in effect before September 1, 2027.

Accounts that are no longer required may be deactivated. Accounts that have been inactive for approximately 12 months may be identified for review by CESBA or the participating organization's GET SET Administrator.

7. Retention

OSIT/ORC is not intended to provide permanent storage of learner assessments.

CESBA's target retention periods are:

- assessed submissions: six months after completion of the assessment;

- unassessed submissions: up to eight months after submission, allowing additional time for assessments that were not completed promptly.

CESBA is moving from historically manual cleanup toward automated enforcement of these retention periods.

Participating organizations should retain any records they require in their own approved records-management systems rather than relying on OSIT/ORC as permanent storage.

Deleted information may remain temporarily in protected backup copies until those backups expire through normal backup rotation. Backup copies are intended for service recovery and are not used as active learner records.

8. Access, correction, export and deletion

Learners should direct requests concerning their assessment information to the participating organization through which they completed the assessment.

Participating organizations may request assistance from CESBA to locate, correct or delete learner assessments, provide copies of records, or export information where required.

9. Hosting and data location

Production OSIT/ORC services are hosted on CESBA-managed infrastructure located in Quebec, Canada.

Production services use encrypted HTTPS connections. Database access is restricted to the application environment and is not exposed as a public Internet database service.

CESBA maintains application/database backups and infrastructure-level recovery mechanisms.

CESBA is reviewing its off-site backup arrangements for OSIT/ORC with the objective of ensuring that backups containing learner assessment information are also retained in Canada.

Until that review and migration are complete, CESBA does not represent that every historical backup copy has remained exclusively within Canada.

10. Backups and recovery

CESBA maintains multiple recovery mechanisms for OSIT/ORC, including:

- daily logical database backups;
- versioned filesystem snapshots of application files and configuration;
- monitored backup freshness; and
- infrastructure/provider-level recovery mechanisms.

Backup processes are monitored for successful completion. CESBA periodically reviews backup retention and intends to include restoration testing as part of its operational procedures.

11. Security safeguards

CESBA applies safeguards appropriate to the nature of OSIT/ORC and the learner information it contains. Current safeguards include:

- HTTPS/TLS encryption for public connections;
- host firewalling;
- restricted database network access;
- role-based application access;
- server-side enforcement of participating-organization boundaries;

- multi-factor authentication for CESBA administrative accounts;
- WordPress security monitoring;
- operating-system and application maintenance;
- monitoring of server availability, storage, system load and backup freshness;
- application availability and TLS certificate monitoring; and
- restricted administrative access.

CESBA reviews and improves these controls as the service and its underlying infrastructure evolve.

CESBA does not presently claim SOC 2, ISO 27001 or similar independent certification for OSIT/ORC.

12. Third-party service providers

CESBA uses service providers where necessary to host, secure, maintain or monitor OSIT/ORC. These providers may process limited information necessary to provide their services.

CESBA does not provide learner assessment information to third parties for advertising or unrelated profiling.

CESBA periodically reviews service-provider arrangements, including the geographic location of data and backups.

13. Cookies and technical information

OSIT/ORC and security components may use cookies and similar technical mechanisms needed for application sessions, authentication, security controls, protection against malicious traffic and service administration.

CESBA does not intentionally use OSIT/ORC learner assessment information for advertising tracking.

14. Artificial intelligence and automated decision-making

OSIT and ORC do not intentionally incorporate artificial intelligence, machine learning, generative AI or automated decision-making.

Assessment responses are reviewed by authorized human assessors. OSIT/ORC does not use learner information to train AI models.

15. Security and privacy incidents

CESBA maintains technical monitoring intended to identify service and infrastructure failures and supports investigation of reported privacy and security incidents.

If CESBA confirms a privacy or security incident affecting a participating organization's learner information, CESBA will notify the affected organization without unreasonable delay and provide information reasonably available to support the organization's response.

Privacy or security concerns relating to OSIT/ORC may be reported to:

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Participating organizations remain responsible for their own statutory notification, reporting and response obligations.

16. Accessibility

CESBA aims to make OSIT/ORC usable and accessible, including making an effort to adhere to the principles of AODA.

OSIT/ORC has not yet undergone a formal WCAG 2.1 AA accessibility audit, and CESBA does not currently make a formal WCAG conformance claim.

17. Service limitations and participating-organization responsibilities

OSIT/ORC is provided by CESBA as a shared program resource for participating organizations.

Participating organizations are responsible for:

- determining their authority to collect and use learner information;
- assigning access only to appropriate staff;
- removing access when staff no longer require it;
- responding to learner privacy requests in accordance with their own obligations;
- retaining records required for their own official recordkeeping outside OSIT/ORC; and
- notifying CESBA promptly of suspected unauthorized use or security incidents.

Use of OSIT/ORC does not, by itself, establish compliance with MFIPPA, the Education Act or another participating organization's legal or policy obligations.

18. Changes to these practices

CESBA may update this document as OSIT/ORC, its infrastructure, applicable requirements or CESBA's operating practices change.

Material changes affecting how learner information is collected, used, disclosed or retained will be reflected in an updated version of this document.