

DRAFT POLICY RECOMMENDATIONS

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*Assessing Privacy Risks of Extra-National Outsourcing of eCommunications:
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Recommendation 1

Universities, as publicly funded institutions, should show leadership in upholding and championing our constitutional rights in Canada, including privacy, freedom of expression, freedom of association and other rights. These values should inform policy development and information technology decision-making.



Recommendation 2

Universities should start with a presumption against storing personal, confidential and other sensitive data outside Canada.

Recommendation 3

Universities should take measures to ensure that personal, confidential and other sensitive data is routed on-campus or inside Canada whenever possible.

Recommendation 4

Universities should use their institutional position to procure information and communication services for its members that provide greater levels of privacy and security than are generally available to consumers.



Recommendation 5

Universities should be transparent about their current policies and practices regarding disclosure of personal, confidential and other sensitive data to third parties.



Recommendation 6

Universities should adopt and promote reliable, effective, easy to use encryption and other security measures, and contribute to their development.

Recommendation 7

When considering the procurement of eCommunications services for its members, universities should conduct thorough, transparent Threat and Risk Assessments (TRAs) and Privacy Impact Assessments (PIAs) using recognized best practices appropriate to the full range of its specificities as public academic institutions, and update those assessments on an annual basis. Technologies change quickly; PIAs/TRAs need to be part of ongoing processes.



Recommendation 8

When considering the procurement of any outsourced e-service, but particularly for eCommunications for its members, universities should conduct an open, effective and participatory consultation process with the entire community, even if only one constituent group is targeted.



Recommendation 9

When considering the procurement of any outsourced e-service for its members, universities in Canada should consider developing an independent Canadian vendor review program, perhaps under the auspices of CCUCIO, rather than the US-focussed EDUCAUSE.