



qathet School District Privacy Impact Assessment

PART 1: GENERAL INFORMATION

Initiative title:	Scribeberry
Ministry:	Ministry of Education and Child Care
Organization:	qathet School District
Date:	February 26, 2026
PIA Number:	20260226
Privacy Policy:	https://www.scribeberry.com/product/security
Privacy Compliance:	PIPA (BC)
Organization Lead name and title:	Tawnie Gaudreau, Director of Inclusive Education
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Privacy Officer (PO):	Steve Hopkins
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Phone:	604.414.2604

Your PO will complete the questions in the table below.

FOR PO USE ONLY
Is this a PI or non-PI assessment?
PI assessment
*Is this initiative a data-linking program under FIPPA?
No



Is this initiative a common or integrated program or activity under FIPPA?
Yes
Related PIAs, if any:
N/A
*Does this initiative involve disclosures of sensitive personal information outside of Canada?
No
Is there an Information Sharing Agreement as part of this initiative? If yes, please have the Information Sharing Agreement Supplement attached to this PIA when submitting to PPL.
No

*If the answer to either of these questions is yes, you must submit this PIA to the Office of the Information and Privacy Commissioner.

1. What is the initiative?

[Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.]

Scribeberry will be used to capture live captioning and generate transcripts of learning activities for students in the Auditory Outreach Provincial Resource Program. Scribeberry is an AI-powered scribing and documentation tool that transcribes and summarizes spoken content such as teacher lectures, audio from learning materials, and peer discussions, and converts it into text that students can read, revisit, and review.

The District Principal of the Auditory Outreach Provincial Resource Program purchases user licences from Scribeberry and invites each student participating in the pilot project to create an individual user account. The student's school district email address is used as their Scribeberry username, and each student creates their own password. Once the account has been set up, access to the Scribeberry account is limited to the individual student.



To generate a transcription, the teacher or student (depending on the learning activity) wears the microphone paired with the student's hearing device and receiver. The person wearing the microphone controls when the transcription starts, pauses, and ends. During teacher-led learning activities, the student may also start, pause, or stop the transcription; however, if the teacher has muted the microphone, the transcription will be blank.

Transcriptions are saved in the student's Scribeberry account and may also be downloaded to the student's school district account, such as OneDrive or Google Drive.

Scribeberry does not create or store audio recordings. It retains only the written transcript in the student's Scribeberry account. Overall, this initiative is intended to support equitable access to learning by improving transcription accuracy and providing students with accessible text-based learning materials.

This pilot project is being facilitated by the Auditory Outreach Provincial Resource Program. At the end of the trial period, each participating school district will decide whether to continue using Scribeberry and will be responsible for its own subscription.

2. What is the scope of the PIA?

[Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?]

This PIA has been developed for qathet School District and is also intended to serve as a template for other school districts that access the Auditory Outreach Provincial Resource Program and may wish to use Scribeberry in their own districts.

The Auditory Outreach Provincial Resource Program serves more than 1,000 students across 56 school districts in British Columbia. The pilot project is open to up to 50 K–12 students participating in the program, although most participants are expected to be at the intermediate and secondary levels. Each student enrolled in the pilot will have access to Scribeberry for a period of two months.



3. What are the data or information elements involved in your initiative?

[Please list all the elements of information or data that you might collect, use, store, disclose, or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.]

- School District Information (district and school names)
- Billing and Payment Information (name, work email, billing address, and credit card details processed for payment)
- Initiative Lead Information (name, work email, role)
- Student Identifying Information (name, school district email, school, login credentials)
- Generated Content (transcription) For any generated content, students should download transcripts only to school district accounts (e.g., OneDrive or Google Drive) and delete them at the end of the semester or school year. Access to Scribeberry accounts is limited to each individual student; only the student can access their own account.

3.1 Did you list personal information in question 3?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Yes.

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you to identify the legal authority for collecting, using, and disclosing personal information and to confirm that all personal information elements are necessary for the purpose of the initiative.



4. Collection, use, and disclosure

[List all data elements involved in this initiative (from the district, school, staff, and students). Determine whether the information is being collected, used, or disclosed. Include relevant FIPPA section references where applicable. Add or remove rows as needed.]

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use, disclosure	FIPPA authority	Other legal authority
A district account/licence purchase is set up by the District Principal using the school district name, the District Principal's name and email address, and school or district credit card information.	Collection Use Disclosure (to service provider)	s.26 s.32 s.33	
The District Principal invites each student participating in the pilot to create an individual Scribeberry account, using the student's school district email address.	Use Disclosure	s.32 s.33	
The student creates their Scribeberry account using their school district email address as the username and creates their own password.	Collection Use	s.26 s.32	
The student signs in to Scribeberry using their district email address and password.	Use	s.32	
During a learning activity, the teacher or student wears the microphone paired with the student's hearing device/receiver and starts/pauses/stops transcription as needed.	Collection Use	s.26 s.32	



Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use, disclosure	FIPPA authority	Other legal authority
Scribeberry processes the live audio in real time using an encrypted channel to generate text. Scribeberry does not create or retain audio recordings.	Use	s.32	
The transcript is saved in the student's Scribeberry account.	Use	s.32	
The student views, revisits, and uses the transcript in Scribeberry to support understanding and review of classroom learning.	Use	s.32	
The student also has the option to download the transcript from Scribeberry to their school district account (e.g., OneDrive) for school use.	Use	s.32	

5. Collection Notice

[If you are collecting personal information directly from the individual the information is about, FIPPA requires that you provide a collection notice (except in limited circumstances).]

Review the [sample collection notice](#) and write your collection notice below. You can also attach the notice as an appendix. Informed consent forms can also be added or referenced below.

Informed, written parent/guardian consent will be obtained before any student uses Scribeberry. Seeking informed consent helps ensure families understand what the tool



does, what information may be involved, how it will be used, and what safeguards are in place.

The consent process will clearly describe the purpose of the initiative, how Scribeberry functions (including that audio recordings are not stored and only the written transcript is retained), what types of information may appear in transcripts, where transcripts may be stored (school district-approved storage platforms), and the expected retention and deletion practices. Families will also be informed that participation is voluntary, how questions or concerns can be raised, and what alternative supports will be available for students who do not participate.

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

6. Is any personal information stored outside of Canada?

Type “yes” or “no” to indicate your response. If no, Part 4: Assessment of Disclosures Outside of Canada is not required.

No. Canadian user data is stored and processed on Canadian servers (Microsoft Azure and Google Cloud data centers located in Canada). Scribeberry does not use or retain any user-submitted data to train large language models (LLMs), whether those models are third-party or hosted by Scribeberry on Microsoft Azure.

Transcripts are stored in the student's individual Scribeberry account. If a student downloads a transcript for school use, it must be saved only to school district-approved storage platforms (e.g., OneDrive or other district-managed systems) and not to personal email accounts, personal cloud storage, or unapproved apps or websites.

7. Does your initiative involve sensitive personal information?

Type “yes” or “no” to indicate your response.



[Sensitive personal information is not defined in FIPPA. Some types of personal information can be considered sensitive because there is higher risk of harm to individuals if the information is improperly collected, used, or disclosed.]

No. The information collected does not have a high risk of affecting a student's or staff member's safety, dignity, reputation, well-being, or opportunities if it were accessed or shared without authorization.

PART 5: SECURITY OF PERSONAL INFORMATION

This part captures information about the privacy aspects of securing personal information. People, organizations, or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical (e.g., your office building or work environment) and technical (e.g., online cloud service) environments.

8. Does your initiative involve digital tools, databases or information systems?

Type "yes" or "no" to indicate your response.

Yes.

- If yes, you may need to involve your PO and possibly your [Ministry Information Security Officer](#) (MISO). Together you can assess whether your initiative needs a security assessment

8.1 Do you or will you have a security assessment to help you ensure the initiative meets the reasonable security requirements of FIPPA section 30?

Type "yes" or "no" to indicate your response.

No. Security assessment for this digital tool is not necessary.

8.2 Does your initiative involve generative artificial intelligence or machine learning?

Type "yes" or "no" to indicate your response.



Yes. This initiative involves artificial intelligence. Scribeberry uses an AI-based transcription service to convert live speech into text in real time, and the transcribed text can then be used to generate additional outputs (e.g., notes/summaries).

Scribeberry states that it does not store or create audio recordings (audio is processed in real time and discarded) and that user data is not used to train large language models (LLMs), whether those models are third-party or hosted by Scribeberry on Microsoft Azure and Google Cloud infrastructure.

9. Are all digital records stored on school district servers and are all physical records stored in school district offices with security?

Type “yes” or “no” to indicate your response.

- If no, describe where the records are stored and the technical and physical security measures in place to protect those records.

No. Digital records created through this initiative are stored in two possible locations, depending on how the tool is used:

- Within Scribeberry: Transcripts are stored in the student’s individual Scribeberry account. Scribeberry uses Microsoft Azure and Google Cloud infrastructure, and states that Canadian customer data is stored on Canadian servers, with data protected using encryption in transit and at rest, along with role-based access controls and audit logging.
- Within school district systems (optional): If a student downloads a transcript for school use, the transcript must be saved only to school district–approved storage platforms (e.g., OneDrive or other district-managed systems). In that case, the downloaded copy is stored within district systems and is subject to district security, access controls, and retention practices.

This initiative does not involve physical records being stored in school district offices. The records generated are digital.



10. Controlling and tracking access

Strategy
We allow employees only in certain roles access to information. The District Principal only will have access to the Scribeberry district account.
We ensure that students only have access to their individual Scribeberry accounts. For younger students or students who require support, school staff may assist with access and use, and only for the purpose of supporting learning.
We require multi-factor authentication (MFA) for any administrative or staff accounts that access school personal information.
We obtain informed consent from students and parents that indicate that records from Scribeberry that are downloaded must be stored by using district-approved storage only.
We have limited student access to Scribeberry to a two-month trial period.
Scribeberry also lists describes several controlling and tracking access strategies on their security page: https://www.scribeberry.com/product/security .

PART 6: ACCURACY, CORRECTION, AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

11. How will you make sure that the personal information is accurate and complete?

[FIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.]

- Staff and students who use Scribeberry will be provided with clear guidance to take care that any information entered, edited, or saved (including names, identifiers, and transcript content) is correct and complete before it is submitted, downloaded, or shared.



- Student accounts are created using district email addresses to reduce errors in identity and account matching.

12. Requests for correction

[[FIPPA](#) gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.]

12.1 Do you have a process in place to correct personal information?

Type “yes” or “no” to indicate your response.

Yes. If a student or parent/guardian believes there is an error or omission in personal information connected to this initiative within Scribeberry (e.g., email address or other account information), corrections are addressed first through student control (e.g., updating credentials). Where a correction cannot be completed by the student (e.g., account identifier changes or administrative corrections), the District Principal/Privacy Officer will submit a request to Scribeberry to update or remove the information.

12.2 Sometimes it’s not possible to correct the personal information. [FIPPA](#) requires that you make a note on the record about the request for correction if you’re not able to correct the record itself. Will you document the request to correct or annotate the record?

Type “yes” or “no” to indicate your response.

Yes. If we are unable to correct the personal information itself, we will document the correction request and the outcome, and where applicable add a note/annotation to the related record indicating that a correction was requested and could not be made, including the date and reason.



12.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FIPPA requires you to notify the other public body or third party recipient of the request for correction. Will you ensure that you conduct these notifications when necessary?

Type “yes” or “no” to indicate your response.

Yes. When a correction request is received and we determine that the individual’s personal information was disclosed to another public body or a third-party recipient within the last year, we notify those recipients of the request for correction as required under FIPPA, and document that the notification was completed.

13.Does your initiative use personal information to make decisions that directly affect an individual?

Type “yes” or “no” to indicate your response.

No.

PART 7: PERSONAL INFORMATION BANKS

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

14.Will your initiative result in a personal information bank?

Type “yes” or “no” to indicate your response.

No.

- If yes, please complete the table below.

Describe the type of information in the bank
Name of main ministry or agency involved



Any other ministries, agencies, public bodies, or organizations involved
Business contact title and phone number for person responsible for managing the Personal Information Bank

PART 8: ADDITIONAL RISKS

15. In the table below describe any additional risks that arise from collecting, using, disclosing, or storing personal information in your initiative that have not been addressed by the questions on the template.

Add new rows if necessary.

Possible risk	Response
Risk 1: Incidental capture of other people's personal information (e.g., classmates' names/comments)	Use start/pause/stop intentionally; prefer directional mic when possible; set classroom expectations (avoid names/sensitive details); delete transcripts that capture unnecessary third-party info.
Risk 2: Capture of sensitive information (e.g., health, behaviour, family circumstances)	Do not use during private/disciplinary/health conversations; pause/stop when sensitive topics arise; delete transcripts that include sensitive content.
Risk 3: Student sharing or forwarding transcripts beyond intended audience	Provide student-facing guidance on "for learning support only"; encourage sharing, if needed, with staff they interact with only; discourage sharing outside school context;



Possible risk	Response
	align with district expectations for student information handling.

PART 9: SIGNATURES

qSD Signatures

This PIA accurately documents the data elements, information flow, and information about disclosure and storage outside of Canada at the time of signing. If there are any significant changes to the overall initiative, including to the way personal information is collected, used, stored, or disclosed, the program area will engage with their PO and if necessary, complete a PIA update.

Please ensure that you have reviewed the privacy risks and risk responses in [Part 4: Assessment of Disclosures Outside of Canada](#).

Organization Comments

Role	Name	Electronic signature	Date signed
Initiative Lead	Lora Baker		
Organization Lead	Tawnie Gaudreau		
Privacy Officer (PO)	Steven Hopkins		

PART 10: APPENDICES

This section will list or hyperlink to all appendices noted in the document.