MEMORANDUM

To: University Community
From: Robert Cook, Chief Information Officer
Date: February 7, 2011
RE: **Report # 4 and Recommendations, Student e-Communications Services**

Following my September 15th, 2010 *Report #3 and Recommendations, Student e-Communications Services,* I was authorized to "commence detailed discussion with Microsoft Canada toward implementation of *Live@edu* as the institutional email service for students, subject to a number of conditions."

I wish to provide an update on those discussions, and make the consequent recommendation to the provost that the University move to implement Microsoft's *Live@edu* as the new platform for student e-Communications services, subject to:

- Conclusion of a final round of communication with the University community satisfactory to the provost.
- Confirmation that *Live@edu* and its successor products meet the functional and multi-platform interoperability requirements of the University.
- Determination by officers of the University that the project's Security Risk Analysis and Privacy Impact Assessment are acceptable.
- Conclusion of a satisfactorily worded agreement between the University and Microsoft.

Update:

As detailed in earlier reports (available on the project website), broad consultation across the University with students and their organizations, faculty and staff revealed a strong desire for more robust student e-communications services. The consultation, through face-to-face meetings and a variety electronic means including a survey and online comment submission, also revealed areas of concern. Detailed discussion with Microsoft has led to proposal for substantially improved services (see project website http://email.utoronto.ca) with arrangements to address the concerns voiced:

- All inbound email to any utoronto.ca address would be received first by University servers rather than Microsoft.
- This establishes an option for students to choose not to establish an account at Microsoft *Live@edu*, but rather have email to their new @mail.utoronto.ca address redirected to any service of their choosing.
- For students choosing to use *Live@edu* services, there would be no advertising (or to faculty or staff, if the University permits them to establish trial accounts.) Microsoft retains the right to advertise to alumni (if we choose to include alumni in the service), but currently does not advertise to alumni accounts.
- The contract for *Live@edu* "Core" services (i.e., email and calendaring) would be with the University, not the end user. The agreement for other optional, free services ("Consumer" services such as Sky Drive, online Microsoft Office applications, instant messaging, etc.) would be directly between the student and Microsoft.

- Microsoft makes no ownership claim on data provided by users. Current University practices regarding ownership and administrative access to data would continue.
- Microsoft provides tools to University system administrators for incident management.
- Applicable law and jurisdiction of the agreement would be Ontario and Canada.

These understandings leave only the important areas of privacy and security to be concluded. In discussion, there has been agreement that:
- Microsoft would do no data mining.
- Authentication would be handled by the University, with no account password being passed to Microsoft when the account is accessed through the web interface.
- Microsoft would make available to University SAS 70 Type 2 (industry standard) internal controls compliance reports.
- Data would be encrypted in transit between the University and Microsoft.

Other privacy and security requirements have been agreed in principle and are awaiting contract language.

It is recognized that the proposed services are in the "Cloud", would not under full control of the University, and hence present unique challenges that are addressed in the Privacy Impact Assessment. User practice may result in the transmission of Personal Information to, and its storage on, servers in the United States and elsewhere, making such information subject to foreign law, and explicitly the PATRIOT Act. This will require notification to University users so that they can decide if and how to use the service.

Our Director of Information Security suggests that information within the *Live@edu* service would likely be protected by greater security than the University is able to provide with its self-operated systems. The goal for privacy is to achieve protection as good as or better than that secured in any existing email outsourcing arrangement in a Canadian university.

Recommendation:

The CIO recommends proceeding toward implementation of Microsoft's *Live@edu* as the new platform for student e-communications, as it can meet and likely exceed student expectations and adequate protections are on track to be reached. Conditions to be met before confirming the arrangement include:
- Conclusion of a final round of communication with the University community satisfactory to the provost.
- Confirmation that *Live@edu* and its successor products meet the functional and multi-platform interoperability requirements of the University.
- Determination by officers of the University that the project's Security Risk Analysis and Privacy Impact Assessment are acceptable.
- Conclusion of a satisfactorily worded agreement between the University and Microsoft.

Implementation:

A proposed service Implementation Plan is under development and details will soon be available on the project website http://email.utoronto.ca. The anticipated timeline would target pilot testing in the spring and summer of 2011, roll out to incoming students for September 2011, and conversion of accounts for existing student starting in the fall 2011.