Royal Roads
UNIVERSITY

Royal Roads University
Privacy Impact Assessment
Proctorio Learning Integrity Platform

Part 1 – General

Name of Department/Branch:	RRU – Centre for Teaching & Educational Technologies		
PIA Drafter:	Bev Hooper Privacy Officer		
Email:	Bev.hooper@royalroads.ca	Phone:	250-391-2600 ext 4178
Program Manager:	Darrell Pettyjohn, Manager, Learning Technologies		
Email:	darrell.pettyjohn@royalroads.ca	Phone:	250-391-2533

1. Description of the Initiative

The Centre for Teaching & Educational Technologies (CTET) at Royal Roads University is piloting the Proctorio Learning Integrity Platform (Proctorio), an online proctoring service.

Proctorio is an online application and service that offers automated remote proctoring so students can take exams from anywhere. Each student's behavior is monitored by recording video, audio, and/or screen activity during the exam to try to ensure exam integrity. Students go through an authentication process before they start, so there is no need to set a specific date and time or pre-register. Students authenticate by logging into the RRU Moodle Learning Management System with their University provided computer access credentials. Moodle has a student photograph already available for each student so it is also easy to verify if the person taking the exam is indeed the actual student. Proctorio analyzes media in real-time and flags potential issues for instructor review, so instructors have the final decision.

Proctorio will integrate with RRU's learning management system, Moodle. It's seamless integration means there are no additional logins for students to remember and no scheduling issues to worry about as the student logs in using their existing RRU credentials. Because Proctorio fully integrates with all learning management systems and test platforms, test taker data stays with the testing institution and not with Proctorio. With Proctorio, RRU can easily add automated invigilation and identity verification in order to receive instantaneous integrity reports as soon as exams are submitted.

The Proctorio platform includes ID verification, automated invigilation, content protection, secure browser settings, computer lock down, originality authentication, administrative and faculty controls, and, analytics.

Proctorio uses advanced machine learning and state-of-the-art facial recognition technology to deliver accurate, reliable exam proctoring that outperforms human proctors.

Customizable settings allow instructors and administrators to create test environments specific to their assessment needs.

All data analytics and suspicious behaviors are captured during the assessment and integrity reports are immediately available for review upon exam submission.

A live proctoring option is available without scheduling which allows immediate intervention during an exam and provides full protection, recording, and reporting on demand.

To take a Proctorio proctored exam, students would:

1. Sign into the university Learning Management System (LMS) with their university computer account. This is how students access most of their course materials and interact with faculty and students. https://moodle.royalroads.ca/moodle/login/index.php
2. Initiate the exam activity from within a course. All exams are based on the Moodle quiz activity. https://docs.moodle.org/23/en/Quiz_module
3. Proctorio will then ensure the student's computer and internet connection meet the requirements to take the exam. A working camera and microphone must be available
4. Recording of audio, video and the computer screen are then started. These recordings are encrypted before being transmitted to and stored, with a second level of encryption, on Proctorio servers
5. Once the exam is completed, recording stops
6. The recordings can only be decrypted on the university LMS and viewed by authorized users

2. Scope of this PIA

This Privacy Impact Assessment will consider the collection, use, disclosure, security and storage of personal information for the Proctorio Learning Integrity Platform.

3. Related Privacy Impact Assessments

There are no other privacy impact assessments related to this PIA.

4. Elements of Personal Information or Data

When taking an exam, personal information collected by RRU includes the Moodle user id#, exam id#, IP address of the computer being used to take the exam and student behaviours during the exam (collected via video, audio and/or screen activity). This information is encrypted before transfer and before it is stored and Proctorio has no access or ability to decrypt the data while being stored on their servers.

The only time Proctorio would contact a student would be in the case that the student had any technical difficulties and needed assistance with troubleshooting. In this instance the student would reach out to Proctorio for assistance at that time. Proctorio will not invite users to participate in surveys, questionnaires, contests or to provide feedback.

If a student contacts Proctorio support outside of the LMS/Moodle the student's name, phone number, institution name, and campus email address may be collected to facilitate the troubleshooting process. Disclosure of such information is considered voluntary and will not be used to create a record.

The personal contact information gathered is not verified as Proctorio does not have any previously collected personal information to compare it to.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

All student information collected during an exam is stored in an encrypted state outside of Canada on Microsoft Azure's cloud environment and is available only to the RRU course instructor, select RRU program support staff and some RRU Moodle (LMS) administrators. Proctorio has no ability to access the encrypted personal information.

6. Data-linking Initiative*

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.

1. Personal information from one database is linked or combined with personal information from another database;	Yes
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	No
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	No

If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.

7. **Common or Integrated Program or Activity***

> In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

1. This initiative involves a program or activity that provides a service (or services);	Yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	No
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

8. **Personal Information Flow Diagram and/or Personal Information Flow Table**

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	Student logs into the operating environment and identity verification is completed	collection	26(c)
2.	Student recorded taking exam (audio and video capabilities)	collection	26(c)
3.	Faculty reviewing exam recordings	use	32(a)
4.	Exam recordings are stored On US based Microsoft Azure cloud storage in an encrypted format.		

9. **Risk Mitigation Table**

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	Unauthorized individuals access the personal information and use or disclose it for personal purposes	RRU - privacy and security policies and training Proctorio – privacy and security policies, contractual obligations, data encryption, ID	Low	High

		anonymization		
2.	Student's information is incorrect or inaccurate	Video captures real time recording of student taking exam, student authenticates using existing RRU credentials.	Low	Medium
3.	User's personal information is compromised in Proctorio	Privacy and Security policies are in place, contractual obligations, data encryption, ID anonymization	Low	High

10. Collection Notice

The following notification will be present before a student initiates Proctorio's services:

Your personal information is collected under the authority of the *University Act* and is subject to the *Freedom of Information and Protection of Privacy Act*. Your personal information will be used to initiate Proctorio's exam proctoring services including the recording of video and audio of you while you take your exam(s). The personal information will be reviewed by your instructor to ensure that all examination requirements are being met, and will be used if you request technological support services from Proctorio as required. Your personal information will be encrypted and confidentially stored by Proctorio outside of Canada at a Microsoft Azure cloud storage facility in the US. Proctorio will not have any capability to decrypt your personal information at any time while it is being stored. Your personal information will not be disclosed to any other external third parties unless we are directed to do so by you. For more information regarding the collection and use of your personal information please contact Royal Road's University's Privacy Officer at (250) 391-2600 (Extension 4178) or via regular mail at 2005 Sooke Road, Victoria, BC V9B 5Y2.

I have read the above notification and I consent to the collection, use and/or disclosure of my personal information as described _____.

I have read the above notification and I do not consent to the collection, use and/or disclosure of my personal information as described _____.

Please note if you do not wish to consent to the use of Proctorio exam proctoring services, arrangements will be made for you to take the exam at an approved proctoring location near you.

Part 3 – Security of Personal Information

11. **Please describe the physical security measures related to the initiative.**

    RRU:

    Restricted access to server and storage infrastructure as well as access monitoring.

    Proctorio:

    Section 15(1)(l), Section 21

12. **Please describe the technical security measures related to the initiative.**

    RRU:

    Section 15(1)(l)

Proctorio:

Section 15(1)(l), Section 21

13. **Does your branch/department rely on any security policies?**

    RRU:

    Information Security Policy: http://policies.royalroads.ca/policies/information-security-policy
    IT Security Policy: http://policies.royalroads.ca/policies/it-services-information-security-policy
    Privacy Policy: http://policies.royalroads.ca/policies/privacy-policy

    Proctorio:

    https://proctorio.com/privacy
    https://proctorio.com/about/personal-data-protections
    https://proctorio.com/ferpa

14. **Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.**

    RRU:

The LMS will restrict who can access or delete collected data based on need to know principles. It is not possible to add data other than by taking an exam. There is no way to change recorded data.

Proctorio:

Only authorized officials at the testing institution can access data collected by Proctorio's Learning Integrity Platform.

15. **Please describe how you track who has access to the personal information.**

   RRU:

   The LMS access roles and course enrollments specify who has access to the personal information.

   Proctorio:

Section 15(1)(I), Section 21

Part 4 – Accuracy/Correction/Retention of Personal Information

16. **How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?**

   N/A. Monitoring is completed in real time, therefore updates or corrections are not required.

17. **Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.**

   Yes, exams are proctored online to confirm student's conformity to the testing requirements.

18. **If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

   Monitoring is conducted and recorded in real time.

19. **If you answered "yes" to question 17, do you have records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

   RRU:

   Courses are kept for three years after they have completed as per University course archive guidelines.

<u>Proctorio:</u>

Proctorio will store and maintain institutional data for up to 30 days after the termination of an applicable agreement, unless otherwise specified. If RRU has entered into a SaaS Agreement with Proctorio then they will retain the data for six months by active data retention and for one year by cold storage. According to the Institution's preference regarding data destruction, Proctorio will either: 1) destroy the data, or 2) deliver it to the Institution.

Part 5 – Further Information

20. **Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

No.

Please check this box if the related Information Sharing Agreement (ISA) is attached.

21. **Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.**

No.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

22. **Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.**

Yes.

(a) Exam Proctoring Results

(b) Moodle user id#, Moodle exam id#, IP address, audio, video and screen shots taken of student during exam (student behaviours), name of course, and student phone number.

(c) FIPPA Section 26(c)

(d) To monitor students while taking exams remotely to ensure conformity to exam requirements.

(e) Instructors

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).

_____   Jan 8 /19
Bev Hooper   Date
Privacy Officer
Royal Roads University
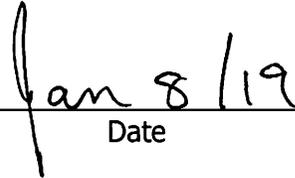
_____   _____
Darrell Pettyjohn   Date
Manager, Learning Technologies,
 CTET
Royal Roads University

_____   _____
Jessica Subin   Date
Associate Director, Financial Services
Royal Roads University

_____   _____
Don Ostergard   Date
A/Chief Information Officer
Royal Roads University

_____   _____
Cheryl Eason   Date
Vice President & Chief Financial Officer
Royal Roads University

A final copy of this PIA (with all signatures) must be kept on record.