

Form A

Please review the entire form before you answer any questions. Providing more information than the questions asks, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open ended questions in the **bolded** prompts. Keep bold font on all answers provided. Answer **Yes / No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes / No** responses.

Name of Department: **Access Resource Centre**

PIA Drafter: **Chrissy Ingram**

Email: chrissy.ingram@unbc.ca

Phone: **250-960-6711**

Oversight Provided by: **Shelley McKenzie**

Email: shelley.mckenzie@unbc.ca

Phone: **250-960-5177**

Description and Scope of Information Management

Describe the purpose of your project/initiative/software. Describe a brief high level overview of the functions, who will benefit from those functions, and who will be impacted if that is not transparent. Indicate if there are groups that are restricted from use and the reason for proposed restrictions. Describe whether there are other reference documents including previous PIAs, whitepapers, or compliance documentation that may support this assessment.

Hikvision is a network video recorder (NVR) viewing software that provides invigilators the ability to monitor a number of exam rooms simultaneously to identify exam irregularities in order to maintain exam safety and academic integrity. The viewing software is embedded on the NVR, so no access to internet is required. Cameras connect directly to the NVR via a CAT6 cable. The NVR and monitor are located at the desk of the Student Services Representative. To allow remote viewing to additional ARC staff, e.g. the Access Coordinator and Access Advisor, ITS have set up a segregated VLAN to access the viewing software on the NVR via UNBC's secure network. The recording functions have been disabled so no footage can be viewed except in real time. PIA #18-001 was approved for a different monitoring software for the ARC but never got installed due to an install problem. In order to book exams at the ARC, students will be provided a collection/consent notice so that the exam monitoring process is transparent.

All Elements of Information or Data

Using concise point form, please list the elements of information or data involved in the initiative, even if no personal information is involved. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work

status, health information, financial information, photos, comments on a blog, or information specific to your subject area.

- **Livestreaming of students and exam stations, with cameras placed in the ceiling of each invigilation room**

Location of Where Information is Managed

Does the information manager, vendor, and / or service provider operate from an office outside of Canada? **No**

Does any user of the information managed in this initiative access this information from outside of Canada beyond during short-term temporary travel? **No**

Does this initiative have any components that temporarily process information outside of Canada? **No**

Does this initiative store information for operational use outside of Canada? **No**

Does this initiative back up or make additional or redundant copies of information outside of Canada? **No**

Privacy Officer Comments, Conditions & Concerns

This PIA is based on a review of the material provided to the Information Governance Officer 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 for approval.

Form B

Please review the entire form before you answer any questions. Providing more information than the questions asks, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open ended questions in the “Answer here” prompts. Keep bold font on all answers provided. Answer **Yes / No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes / No** responses.

Name of Department: **Access Resource Centre**

PIA Drafter: **Chrissy Ingram**

Email: chrissy.ingram@unbc.ca

Phone: **250-960-6711**

Oversight Provided by: **Shelley McKenzie**

Email: shelley.mckenzie@unbc.ca

Phone: **250-960-5177**

Institutional Approvals and Assessments

I have contacted the Chief Information Security Officer to complete all required physical and technical security assessments to ensure my initiative complies with industry standards as applicable to my initiative. **Yes**

I have contacted the Contracts and Supply Chain Management department to complete a review that ensures the purchasing agreement, service agreement, contract, MOA, MOU or other contractual agreement with any external parties involved ensures the compliant management of any information that UNBC provides about its stakeholders. **Yes**

Does the initiative involve systematic disclosures of personal information outside of UNBC? If yes, I will contact the Privacy Officer to ensure that an Information Sharing Agreement is in place. **No**

Does the program involve access to personally identifiable information for research or statistical purposes? If yes, I will contact the Privacy Officer to ensure that an Access to Restricted Records Agreement is in place. **No**

Data-linking Initiative

In FIPPA, "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.

Is personal information from one database linked or combined with personal information from another database? **No**

Is the purpose for the linkage different from the original purpose for which the personal information in each database was originally obtained or compiled? **No**

Is the data linking is occurring between either two or more public bodies or one or more public bodies and one or more agencies? **No**

If I have answered yes to the above three questions, I will work with the Privacy Officer to ensure I meet the requirements for a data-linking initiative? **N/A**

Common or Integrated Program or Activity

In FIPPA, "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.

Does this initiative involve a program or activity that provides a service (or services) through a public body and at least one other public body or agency working collaboratively to provide that service? **No**

Does this initiative involve a program or activity that provides a service (or services) through a public body that is working on behalf of one or more other public bodies or agencies? **No**

The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the Regulations? (Privacy Officer will answer). **N/A**

Please note: If your initiative involves a "data-linking initiative" or a "common or integrated program or activity", advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC) as well. Contact the Information Governance Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.

Personal Information Flow Diagram and/or Personal Information Flow Table

In the table below, complete the Description / Purpose highlighting separately by row each instance that information is collected, used, stored, protected, disclosed and disposed of during this initiative. Unless not possible, ensure these steps are arranged how they would occur chronologically in order to make a transparent work flow. The Privacy Officer will review your steps and determine which type of information management practice each entry is and ensure that the practice is compliant with sections under the Act. This table must be accompanied by a workflow diagram if practices are not transparent or if the PIA is related to a common or integrated program or activity or a data-linking initiative.

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	<i>The student completes an exam booking request, providing consent for livestream, non-recorded invigilation. Access Resource Centre staff book students with exam workspace based on the needs of the student. All of this information is stored in Clockwork, not Hikvision.</i>	<i>Collection & Consent</i>	<i>26(c)</i>
2.	<i>The student’s exam station is set up by ARC staff, who apply all exam accommodations the student requires to do the exam. Notices outside the exam rooms outline the exam invigilation monitoring process.</i>	<i>Disclosure & Use</i>	<i>33.2(c) and 32(a)</i>
3.	<i>The student writes the exam at the assigned workspace, which is being monitored through Hikvision by ARC staff.</i>	<i>Disclosure & Use</i>	<i>33.2(c) and 32(a)</i>
4.	<i>If an exam irregularity occurs while the student is writing the exam, ARC staff cease the exam and investigate the exam irregularity.</i>	<i>Use</i>	<i>32(a)</i>
5.	<i>ARC staff document and report exam irregularities to the instructor and may escalate to the Registrar based on what is seen (not recorded) while monitoring with Hikvision.</i>	<i>Disclosure</i>	<i>32(a), 33.1(1)(e.1)</i>
6.	<i>When the student completes the exam, ARC staff remove the completed exam, provide a copy to the instructor, and retain a backup copy on the ARC G: Drive until the end of the semester.</i>	<i>Collection & Use</i>	<i>26(c), 32(a), 33.1(1)(e.1)</i>
7.	<i>ARC staff delete the copy of the completed exam at the end of the semester. ARC staff delete records of the arrangement to take the exam and potential investigative records after five years, as per the ARC’s current records management and retention schedule.</i>	<i>Disposition</i>	<i>31</i>

Risk Mitigation Table

Please identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. The Privacy Officer will help identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.				
2.				
3.				

ANNEX

Collection / Consent Notice

If your initiative is collecting personal information directly or indirectly from individuals, you must ensure that all individuals involved are told the following:

- The purpose for which the information is being collected
- The legal authority for collecting it, and
- The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place in the space below. The Privacy Officer will review and provide feedback.

Notice of Video Monitoring Software

The Access Resource Centre at the University of Northern British Columbia uses Hikvision video monitoring software to allow Access Resource Centre staff, as invigilators, to monitor students taking exams in order to provide students with a safe environment to take the exams and to ensure the academic integrity of the exam writing service provided to you. An invigilator will be actively monitoring the exam workspace you have been assigned while you write the exam. This system does not record any exam activities. If you have any questions about how the Access Resource Centre uses Hikvision software, please contact the Access Coordinator at 250-960-6711 or email arc@unbc.ca.

In order to book an exam at the Access Resource Centre, I consent to the ARC’s use of Hikvision software to provide a safe environment and protect the academic integrity of my exam, and I acknowledge that my consent is being collected and stored under the authority of section 26(c) of the British Columbia *Freedom of Information and Protection of Privacy Act* RSBK 1996 c. 165.

ARC-registered students booking non-UNBC exams at the ARC, e.g. students taking a course through another institution but who are entitled to approved exam accommodations, will sign a print version of the consent notice listed above as they are not able to book non-UNBC exams in the ARC’s exam-booking platform.

Information Management Controls

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. How is access to information monitored and logged?

Admin access is managed by ITS with local accounts. Only Access Resource Centre staff have access to the limited, non-recording version of Hikvision.

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?

There is no information collected or stored in Hikvision with the non-recording restrictions applied. The exam workstations displayed on the NVR will not be named after individuals. Only student performance is viewed in real time. Any exam irregularities observed by invigilators using Hikvision will be noted in Clockwork, not Hikvision. Students can file an appeal addressing exam irregularities using the regulations in the Academic Calendar.

Information Disposal

Does your initiative use personal information to make decisions that directly affect an individual(s)? **Yes**

If you answered "yes", please explain the efforts that will be made to ensure that information management from collection to disposal will ensure that information used to make a decision about someone is accurate, complete, available when needed and disposed of to meet legal requirements. Describe the records retention timeline for the records generated from this initiative.

The software itself does not produce information that is used to make a decision about an individual. However, the monitoring may result in records being produced outside of Hikvision that directly affect an individual(s).

In the event an exam irregularity is noted while invigilating using Hikvision, the student's exam and any associated email correspondence, e.g. to the instructor or the Registrar, will be added to the student's file in Clockwork. A student's record will be retained for 5 years after their last contact with the ARC. All exam bookings are retained within the student's file, regardless of exam irregularities.

If you answered yes above, please describe retention schedules that apply where retention exceeds the one-year requirement under the Act. Please contact the Information Governance Officer if you require assistance.

Five years is the current retention schedule in place at the ARC.

Personal Information Banks

Will a database or series of folders be created in this initiative that organizes information by name, identifying number, symbol, or other particular identifier of each individual involved. **No**

If yes, will the records or information collected about the individual contain similar types of personal information. If yes, I will contact the Privacy Officer to ensure that I am identifying that this is a Personal Information Bank (PIB) and identifying the legislatively required descriptors listed in section 69 (6) of FIPPA. **No**

ACTIVELY INITIATIVE

Privacy Officer Comments, Conditions & Concerns

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ACTIVE INITIATIVE

Form C

Once the PIA has been approved with or without conditions, the Privacy Officer will collect signatures from the individuals provided below. A copy of the PIA will be distributed to all signatories for convenience or to attach to a requisition or file with a contract.

Please fill in the name, position, and date in the bolded areas indicated then each individual signs under the signature line confirming that individual agrees with the corresponding statement above the signature line.

Name of Individual leading the Program/Project: **Chrissy Ingram**

Position: **Access Coordinator**

I confirm the information management practices in this initiative have been documented on Form A, and B as applicable, as accurately as I am aware and I commit to communicating appropriate information management practices to all individuals participating in this initiative as appropriate. I commit to following the documented practices on this PIA, or arranging a PIA amendment if I am aware information management practices in this initiative change.

Signature: _____

Date **2021/10/12**

Director or Dean Overseeing the Program/Project: **Shelley McKenzie**

Position: **Director, Health and Wellbeing**

I am accountable for overseeing my staff involved in this initiative to ensure they adhere to information management practices presented in this PIA. I will arrange for the project lead named above to contact the Privacy Officer to arrange a PIA amendment if required.

Signature: _____

Date **2021/10/12**

Contact Responsible for Records Maintenance: **Chrissy Ingram**

Position: **Access Coordinator**

I am responsible for ensuring that I understand how records are being maintained within paper, digital or other information systems within this PIA and that I communicate concerns regarding the feasibility, accuracy, or security of information management in this initiative.

Signature: _____

Date **2021/10/07**

PIA # 21-010

Hikivision

Privacy Officer: **Kellie Howitt**

Position: **Senior Project Consultant**

I confirm that this initiative to the best of my knowledge as written in Form A, and B as applicable, has information management practices that comply with British Columbia's Freedom of Information and Protection of Privacy Act.

Signature: _____

Date **2021/10/12**

A final copy of this PIA (with all signatures) will be kept on record with the Privacy Officer. The Privacy Impact Assessment does not commit UNBC to financially or operationally approve this initiative. This signed form does not guarantee that all other appropriate assessments have been completed for this initiative.

ACTIVELY INITIATED