

Privacy Impact Assessment

NetSupport School

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

PIA# 18-001 (Office of the University Secretariat to assign)

Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at adam.cullum@unbc.ca or (250) 960-5139 or visit <http://www.unbc.ca/foipppa>.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to Information Governance Officer even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department:	Access Resource Centre		
PIA Drafter:	Brenda Christensen		
Email:	brenda.christensen@unbc.ca	Phone:	250 960 6711
Department Manager:	Sarah Hanson, Wellness Centre Manager		
Email:	sarah.hanson@unbc.ca	Phone:	250 960 6362

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

Netsupport School is a software solution providing invigilators the ability to monitor and communicate between a "tutor" computer and a series of "student" computers to identify exam irregularities. Invigilators also need to ensure the security of the examination hall before, during and after the examination. This software gives invigilators the capacity to "patrol" all exam rooms simultaneously.

2. Scope of this PIA

A limited version of this software suite is being used in order to block internet use and unauthorized program use, and conduct basic real time monitoring of students during assessments. Restrictions will be applied to the use of this system that can be found in Part 6 near the end of the PIA.

3. Related Privacy Impact Assessments

N/A

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4. All Elements of Information or Data

"Name" associated with PCs, name of student, student number, course number, instructor, name of institution, date of exam.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to the Information Governance Officer for review. You will receive support completing the remaining steps of the PIA.

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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

NetSupport will manage all information using internal resources at UNBC only. Tutor computers and student computers will be hardwired to the existing network.

6. 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.

1. Personal information from one database is linked or combined with personal information from another database;	No
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 the Information Governance Officer to discuss the requirements of a data-linking initiative.	N/A

7. Common or Integrated Program or Activity*

<p>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.</p>	
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.	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.

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

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	The student completes an exam booking request. Access Resource Centre staff book students with exam rooms and associated “student” computer based on the needs of the student.	Collection	26(c)
2.	Use of the student computer is set up applying all of the accommodations the student requires to do the exam while	Use	32(a)

	<i>restricting the test environment to programs necessary for the student to complete their exam.</i>		
3.	<i>The student writes the assessment into the "student" PC which is being monitored by the "tutor" PC.</i>	<i>Collection / Use</i>	<i>26(c), 32(a)</i>
4.	<i>If an exam irregularity occurs while the student is writing the exam, Access Resource Centre staff assigned to the "tutor" PCs, cease the exam and investigate the exam irregularity.</i>	<i>Use</i>	<i>32(a)</i>
5.	<i>Access Resource Centre staff document and report exam irregularities to the instructor and may escalate to the Registrar based on what is seen on the "tutor" PC while monitoring the "student" PCs.</i>	<i>Use / Disclosure</i>	<i>32(a), 33.1(1)(e.1)</i>
6.	<i>When the student completes the exam, Access Resource Centre staff remove the completed exam, send a copy to the instructor and keep a backup copy on the shared drive until the end of semester in case the instructor misplaces it.</i>	<i>Collection / Use / Disclosure</i>	<i>26(c), 32(a), 33.1(1)(e.1)</i>
7.	<i>Access Resource Centre staff delete the copy of the completed exam at the end of the semester. Access Resource Centre staff delete records of the arrangement to take the exam and potential investigative records for five years.</i>	<i>Disposition</i>	<i>31</i>

9. 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. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact
1.			

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2.	

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10. Collection Notice

Notice of Monitoring Software

University of Northern British Columbia

Access Resource Centre

The Access Resource Centre at the University of Northern British Columbia is utilizing NetSupport School software to allow Access Resource Centre staff, as invigilators, to monitor students taking exams to provide students with a safe environment to take the exams and to ensure the integrity of the exam writing service provided to you. Netsupport School system will restrict your access to the internet from the computer you take your exams on, and limit the software applications you can use to take your exam. An invigilator will be actively monitoring your use of the computer you have been assigned while you write the exam. This system does not record any of the activities on the computer that you have been provided.

If you have any questions about how the Access Resource Centre uses NetSupport School to support the capacity to provide you a safe exam environment, please contact Brenda Christensen, Access Coordinator at 250 960 6711 or Brenda.Christensen@unbc.ca

[Hang notice visibly on entrance to all exam rooms. Font, size of text, and contact information details may change. Does not need the "10. Collection Notice" header on utilized copy.]

Part 3 – Security of Personal Information

Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.

11. Please describe the physical security measures related to the initiative (if applicable).

[REDACTED]

12. Please describe the technical security measures related to the initiative (if applicable).

[REDACTED]

13. Does your department rely on any security policies? If so, indicate here:

[REDACTED]

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.

[REDACTED]

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

[REDACTED]

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?

The software does not collect information to update or annotate. The workstations will not be named after individuals. If an exam irregularity occurs while a student is writing an exam, the student can file an appeal addressing the exam irregularity using the regulations in the Academic Calendars.

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

The software itself does not produce information that is used to make a decision about an individual. The software acts a means to prevent exam irregularities by blocking internet access and unapproved software applications while allowing invigilators the capacity to monitor the use of the computers the students are using.

The monitoring may result in records being produced outside of NetSupport School that directly affects an individual.

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.

The invigilator will respond to and create documentation indicating exam irregularities taking place. At least one of the users of the tutor computers will be actively invigilating when assessments take place. Recordings will not be generated.

19. If you answered "yes" to question 17, do you have a 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?

Copies of exams will only be retained until the end of the semester. Any records produced to identify an exam irregularity will be filed in the Access Resources Centre's electronic student files and retained for five years. This information will be forwarded to the Senate Committee on Academic Appeals if the student appeals the evidence of an exam irregularity.

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. If you require assistance completing an ISA, please contact the Information Governance Officer.

N/A

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

No.

<p><i>Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Information Governance Officer, the UNBC Research Office or UNBC Archives.</i></p>	<p>N/A</p>
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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 FIPPA. Under this same section, this information is required to be published in a public directory.

No.

Please ensure Parts 6 and 7 are attached to your submitted PIA.

Part 6 – 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.

The functionality and installation of NetSupport School will be restricted by considering Public Sector Video Surveillance Guidelines. NetSupport School will not utilize any wireless connectivity in its use. The feature inside NetSupport School to “Block any remote computers not using encrypted communications” will be enabled. NetSupport School will not utilize any of the functions that transmit information outside of the university. To protect the privacy of the students using the system, the following features will not be installed or will be disabled if part of the basic NetSupport School Tutor Assistant installation:

- *NetSupport Teacher App’s connection to OneDrive*
- *NetSupport School on Google Chrome*
- *NetSupport School Student for Android*
- *NetSupport School Student for iOS*
- *Messenger Monitoring*
- *Keyboard Monitoring*

- *Screen Capture*
- *Features allowing screens to be shared between students*
- *Audio Monitoring and other Audio Support functions*
- *All recording functionality*
- *Remote launching of Applications*
- *Printer Management*
- *Student Rewards*
- *NetSupport Protect*

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Part 7 - Program Area Signatures

Brenda J. Christensen

Name of Individual leading the
Program/Project
(Normally the individual who
completed the PIA)

[Redacted Signature]

Jan 25/18

Date

S. Hanson RPN.

Department Head

[Redacted Signature]

Signature

Jan 26, 2018

Date

Crayton Hanson

Contact Responsible for Systems
Maintenance and/or Security
(if applicable)

[Redacted Signature]

Jan 26, 2018

Date

[Redacted Signature]

Information Governance Officer
(Privacy Officer)

Frederick
"Adam" Callum

Signature

Jan 26, 2018

Date

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

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.