



Accuplacer

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| Initiative Title: Accuplacer |
| Name of Department: Assessment and Exam Services |

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Part 1 – General Information and Overview

1.1 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.

Accuplacer (and overarching company, College Board) is an online secure testing platform through which we administer the Grade 12 English equivalency test for prospective VIU students, in order for them to demonstrate this admissions pre-requisite. The test is reached through the Accuplacer website. Our staff log in, select the correct test components for that candidate, and then activate the secure browser to run the test. Once in the secure browser, the candidate fills in relevant, basic personal profile information, and then is guided through to the test. They read and agree to a privacy statement before continuing with the test. When the test is complete, the secure browser is closed and browser history deleted.

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We have been administering this online assessment test since at least 2018. It is commonly used across BC higher education institutions for this purpose. VIU's Accuplacer test is used by all VIU campuses, and the results are shared with Registration.

The Accuplacer is instrumental in supporting prospective students to meet VIU requirements and subsequently supporting increased enrolment at VIU.

1.2. 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 is just for the Accuplacer test platform, which is already in use and will continue to be used in the same way.

1.3. Are there any related Privacy Impact Assessments?

Please indicate if this an update on an existing PIA or an additional module that was not covered in the original PIA.

Not that we are aware of.

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

In the table below, 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 an appendix.

| Information Type | Information Collected |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Personal Information | <p>From Students: Last name, first name, country, province, phone number, email address, VIU student number (if they have one), date of birth, gender (male, female or another), currently in high school (yes or no)</p> <p>OPTIONAL (student can choose to answer or not): street address, city, postal code</p> <p>From Third Parties: n/a</p> |

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| | From VIU Employees: n/a |
| Contact details | <p>From Students: name, address, phone number, email address, VIU student number (if they have one), date of birth</p> <p>From Third Parties: n/a</p> <p>From VIU Employees: n/a</p> |
| Account information: what info is required to set up an account? | <p>From Students: Last name, first name, country, province, phone number, email address, VIU student number (if they have one), date of birth, gender (male, female or another), currently in high school (yes or no)</p> <p>OPTIONAL (student can choose to answer or not): street address, city, postal code</p> |
| Commercial information | Business information is collected from individual employees who are certified to proctor exams |

1.4a. Did you list [personal information](#) in question 1.4?

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- see the table below for examples of Personal Information.

Business contact information, in turn, is defined as information to enable an individual at a place of business to be contacted and includes the name, position name or title, as well as business telephone number, address, email or fax number of the individual. BC FIPPA does not protect business contact information.

| Examples of Personal Information | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Name, age, sex, weight, height • Home address, phone number • Race, ethnic origin, sexual orientation • Medical information • Health history • Number or symbol assigned to the individual • Income, purchases and spending habits • Blood type, DNA code, fingerprints | <ul style="list-style-type: none"> • Marital or family status • Religion • Education • Financial information • Criminal information • Employment information • Personal views or opinions, except if they are about someone else |

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- If yes, go to [Part 2](#)
- If no, answer question 1.5 and submit questions 1 to 1.5 to pia@viu.ca. You do not need to complete the rest of the PIA template.

Click or tap here to enter text.

1.5. How will you reduce the risk of unintentionally collecting or disclosing personal information?

Some initiatives that do not require personal information are at risk of collecting, using, or disclosing personal information inadvertently, which could result in an information incident.

The information collected is necessary for the student to set up and account and proceed to take the Accuplacer assessment. This is determined by The College Board. Our department discloses information only to the Registrar's office (student name, student number, test results).

Part 2 – Collection, Use, and Disclosure

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

2.1 Four point “Necessity Test” for the collection, use, and disclosure of Personal Information.

To determine if the Personal Information from your initiative meets the necessity threshold, apply the following four-point test to each element of PI from 1.4 above. Note that each element of PI must meet all four points of the test.

Four point “necessity test” for collecting personal information ([OIPC Canada, 2016](#)).

1. The information is rationally connected and demonstrably necessary to an operating program or activity
2. The information is likely to be effective in meeting the objectives of the program or activity
3. There are no other less privacy-invasive ways to effectively achieve the objectives of the program or activity
4. The loss of privacy is proportional to the objectives of the program or activity

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| Personal Information element | Does it meet all four points of the necessity threshold? | Reasons for keeping or excluding from initiative |
|-------------------------------------|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Name | yes | Necessary for student to create an account and take the assessment, as well as for verification purposes. |
| Date of birth | yes | Necessary for student to create an account and take the assessment, as well as for verification purposes. |
| Home phone number | yes | Necessary for student to create an account and take the assessment |
| Email address | yes | Necessary for student to create an account and take the assessment as well as for contact information and for delivering test results. |
| Student ID # | yes | Necessary for student to create an account and take the assessment, as well as for verification purposes. |
| Country | yes | Necessary for student to create an account and take the assessment |
| Province | yes | Necessary for student to create an account and take the assessment |

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|----------------------------------|-----|--------------------------------------------------------------------|
| | | |
| Gender (male/female/another) | yes | Necessary for student to create an account and take the assessment |
| Enrolled in high school (yes/no) | yes | Necessary for student to create an account and take the assessment |

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2.2 Personal Information Flow Diagram and/or Personal Information Flow Table

In the table below, list the personal information from question 1.4. Think about how each element of information flows through your project. Your Privacy Officer can help you figure out whether each step is a collection, use, or disclosure, and whether you have the legal authority for the way you're working with the information. Alternatively, you can attach a flow diagram to this PIA. Add rows as necessary.

| | 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 or Disclosure) | FIPPA or other legal authority |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|---------------------------------------------------------------------------------|
| <i>E.g.</i> | <i>E.g., Student email, password, and IP address collected by software platform for account creation.</i> | <i>Collection</i> | <i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i> |
| 1. | <p>For off campus Accuplacer requests: Candidate completes webform to initiate exam booking: name, VIU student number, VIU program applied for, birthdate, home address, phone number, email address. They also click yes/no for this: 'I authorize Vancouver Island University [REDACTED]',</p> <p>This information is used to create their profile within the Accuplacer platform, so a test can be created for them.</p> | <p>Collection</p> <p>s. 15(1)(l)</p> | s. 26(c) |
| 2. | <p>For off campus Accuplacer requests: Using the information submitted in the webform, AES staff proceed to generate a voucher for the student using name, country, province, email address and student number. The student requires the voucher code created by VIU in order to take the off-campus Accuplacer.</p> | Use | s. 32(a) |



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| 3. | <p>For off-campus Accuplacer: When the student logs in to take the off-Campus Accuplacer, the student then adds “gender” (M/F/another) and “currently enrolled in high school” (y/n).</p> <p>At this point the student can also add their home address, but it is not required.</p> | Collection / Use | s.26(c) |
| 4. | <p>For off-campus Accuplacer: When AES is informed that the student has completed the Accuplacer assessment, AES will send the results to the student [REDACTED].</p> <p style="text-align: center; color: red;">s. 15(1)(l)</p> | Use | s. 32(a) |
| 5. | <p>For in-person Accuplacer assessments, the student enters all the required information before proceeding to the take the assessment.</p> | Collection | s. 26(c) |
| 6. | <p>For in-person Accuplacer assessments: AES sends the results to the student [REDACTED].</p> | Use | s. 32(a) |

2.3 Risk Mitigation Table

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Thinking through the information flow, identify where there are risks for privacy incidents or data breaches. For each risk, identify a mitigation strategy, as well as the likelihood of an incident, and level of impact or harm if people's information were breached.

| Risk Mitigation Table | | | | |
|-----------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------------------------------------------------------------------------|
| | Risk | Mitigation Strategy | Likelihood | Impact/harm |
| 1 | [REDACTED] | [REDACTED] s. 15(1)(l) | low | Someone else would see the student's name, VIU student number, and test results. |
| 2 | The College Board data breach | College Board has ISO 27001 certification for their information security program and is certified by third-party auditors annually to proactively manage risks and controls. | low | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |

2.4. Collection or Privacy Notice



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If you are collecting personal information directly from an individual the information is about, FIPPA requires that you provide a collection notice, also known as a privacy notification.

A collection notice must contain the following elements:

- The legal authority and section under FIPPA under which you are collecting personal information.
- The purpose for which you are collecting the personal information and how it will be used.
- The contact information of an employee or officer at VIU who can answer questions about the collection of personal information.

Contact the privacy office for a collection/privacy notice template.

Student will encounter the following privacy notice on the Accuplacer website: <https://studentportal.accuplacer.org/studentportalisr.html>
VIU Privacy Management Program: <https://gov.viu.ca/access-and-privacy-viu>

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Part 3: Storing Personal Information

3.1. Is any personal information being stored outside of Canada?

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

Yes: The College Board is storing the personal information collected on servers in the USA. The exact location and platform are not provided on their public facing website.

AES is only storing Accuplacer results, with student name and student number only (no other identifying information). Test results [REDACTED] added to the student's record.

s. 15(1)(l)

3.1.1. Where is the personal information stored?

The College Board is storing their information in the United States.

AES is storing results in AES shared drive (only our staff can access). Registration is attaching results to student files.

3.2. Does your initiative involve sensitive personal information?

Examples of sensitive personal information include personal health information, genetic and biometric data, personal finances, geolocation data, criminal records, counselling records, HR records, payroll records, racial or ethnic origin, sexual orientation, religious, philosophical, or political beliefs, etc.

No.

If **yes**, please complete [Part 4: Assessment for Disclosures of Sensitive Personal Information](#).

If **no**, skip to [Part 5: Security of Personal Information](#)

Part 4: Assessment for Disclosures of Sensitive Personal Information

Complete this section if you are disclosing sensitive personal information. You may need help from your organization's Privacy Officer.

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4.1. Is the sensitive personal information stored by a service provider?

Click or tap here to enter text.

n/a

If yes, fill out the table below, then go to question 4.3. If no, continue to [question 5](#).

Information about Service Provider

| Name of service provider | Name of cloud infrastructure and/or platform provider(s) | Where is the sensitive personal information stored (including backups)? |
|--------------------------|----------------------------------------------------------|-------------------------------------------------------------------------|
| n/a | | |
| | | |

4.2. Provide details on the disclosure, including where and how the personal information is stored.

Answer this if question 4.1 does not apply. Be specific about where and how the information is being stored.

The College Board is storing the personal information collected on servers in the USA. The exact location and platform are not provided on their public facing website.

4.3. Is there a contract that includes privacy-related terms?

If there is a contract with the provider, please describe any privacy-related terms in the contract, or attach the privacy schedule.

Schedule already provided.

Part 5: Security of Personal Information

Section 30 of FIPPA imposes a duty on the public body to prevent unauthorized access to Personal Information both internally and with any contracted third parties. As such, we need to make sure that personal information is safely secured in both physical and technical environments. For each item in this section, please describe the security measures for both the service provider and for VIU internally.



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

For example, physical security measures may include: the security environment of vendor's data centres; storing records containing PI in locked storage rooms, offices, and/or filing cabinets with controls over distributions of keys/access; locked workstations that do not permit others to view your screen (including when working remotely, etc).

Click or tap here to enter text.

Accuplacer results are digital, and AES stores them in AES shared drive which is only accessible to two AES Exam Specialists (and manager). We work in a highly confidential area, and staff always minimizes or locks screens when visitors are present.

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

E.g. Encryption standard for data in transit and data at rest; firewalls, strong passwords; MFA; encrypted documents, etc.

College Board has ISO 27001 and SOC-2 certifications and is certified by third-party auditors annually to proactively manage risks and controls.

5.3 Tracking Access / Access Controls. In this section, you will describe how the unit will minimize the risk of unauthorized access to Personal Information.

5.3.1. FIPPA section 30 requires public bodies to manage access to PI based on the principle of “need to know” – that users may only access information that is necessary to do their job. This is frequently accomplished by assigning role-based access controls (RBAC), and by establishing a security matrix that describes which positions/roles are permitted to access specific types or groups of Personal Information. Access to personal information should only be permitted to those who demonstrate their right of access on the security access chart. [Please describe how access controls work in the department, or with this initiative.](#)

AES staff only have access to Accuplacer results. Certified Accuplacer Proctor/Reporters could hypothetically go into the Accuplacer Portal and look up student information.

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5.3.2 How will you know if sensitive personal information is accessed, including access by service providers? This should include a description of what information is available through logs.

Information not available through Accuplacer.

5.3.3 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.

We give only the lowest Accuplacer access to our invigilators. We have a yearly review of access to ensure unauthorized changes to personal information is restricted.

5.4 What controls does the provider have in place to prevent unauthorized access to sensitive personal information?

Describe technical, administrative, and/or policy measures in place to protect PI. If using a cloud-based service provider, include a description of controls in each layer of the stack: software level, platform level, infrastructure level.

Accuplacer has several layers of access. Two Exam Specialists in the department have Institutional Access and are responsible for giving access to invigilators.

Part 6: Accuracy/Correction/Retention of Personal Information

[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. In this section, you will demonstrate how you intend to keep personal information on file accurate and complete.

6.1 How is an individual's information updated or corrected?

[FIPPA section 29](#) states that a person can ask you to correct their personal information in your custody or control. If it is not possible to update or correct (for physical, procedural or other reasons) it must be



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noted on the record. **Please explain how it will be updated or annotated. If personal information will be disclosed to others, how will VIU notify them of the update, correction, or annotation?**

[Accuplacer Privacy policy](#): To make requests to access, correct, restrict, or delete your personally identifiable information or close your College Board account, please complete the [Your Privacy Choices webform](#), email us at DataProtectionInquiry@collegeboard.org, or contact Customer Service. We'll respond to these requests within a reasonable timeframe and as required by applicable law.

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

Yes

6.2.1. If you answered "yes" to question 6.2, do you have an information schedule in place related to personal information used to make a decision?

FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

Yes. See 6.3 below.

6.3. Do you have a records management schedule in place?

How long will you keep the personal information collected? Is there a plan in place for retention and deletion? Please also use this question to note how long it will be stored by the service provider (if applicable).

As the test results are added to the Official Student Record, it will have full retention (kept indefinitely on student record). The AES department stores exam results on file for five years.



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Part 7 – Personal Information Banks

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

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

| |
|----|
| No |
|----|

If yes, please complete the table below:

| |
|-----------------------------------------------------------------------------------------------------------|
| Describe the type of information in the bank |
| |
| Name of main organization 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 – Further Information

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

| |
|----|
| No |
|----|



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8.2. Will the information collected be used for research or statistical purposes?

N/A

Part 9 – Summary and Proponent Responsibility

This section is for Privacy Office recommendations as well as any limitations due to privacy concerns.

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Part 10: Signatures

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

| | |
|--------------------|---------------------------|
| Reviewed by | Privacy Officer |
| Approved by | Director, Student Affairs |
| Date: | 01-03-2025 |