



Privacy Impact Assessment for [Proctorio] PIA#[will be assigned by PCT]

Why do I need to do a PIA?

Section 69 (5) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a ministry to conduct a privacy impact assessment (PIA) in accordance with the [directions](#) of the minister responsible for FOIPPA. Section 69 (5.1) requires the head to submit the PIA to the minister responsible for FOIPPA for review, during the development of any new system, project, program or activity, or proposed enactment, or when making changes to an existing one. The Privacy, Compliance and Training Branch (PCT) is the representative of the Minister for these purposes. Ministries must submit PIAs to PCT at pia.intake@gov.bc.ca for review and comment prior to implementation of any initiative. If you have any questions, please call the Privacy and Access Helpline (250 356-1851) for a privacy advisor. Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Ministries still need to complete Part 1 of the PIA and submit it, along with the signatures pages, to PCT 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 Ministry: | Ministry of Advanced Education | | |
| PIA Drafter: | Allison Alder (should this be the Privacy Officer?) | | |
| Email: | aalder@selkirk.ca | Phone: | 250-365-1331 |
| Program Manager: | Rhys Andrews | | |
| Email: | randrews@selkirk.ca | Phone: | 250-365-1253 |

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

1. Description of the Initiative

Purchase and implement PROCTORIO, an automated online proctoring software, for post secondary course evaluations. This online tool is integrated with Selkirk College's Moodle Learning Management System (LMS) to enable monitoring (e-proctoring) of online exams. Instructors are able to design and create quizzes, tests, or exams for a Moodle course and enable PROCTORIO to proctor students during the exam session.

2. Scope of this PIA

PIA covers software to be utilized through the college's Moodle learning management system to administer and monitor students taking exams. Students will engage in exams where the software locks down student browsers and employs artificial intelligence to verify identification and monitor student activity during online evaluations. To be considered in-scope of this review:

- privacy and security of the PROCTORIO tool and service



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- data shared between Moodle and PROCTORIO
- student verification and recording of identification
- data collection and recording of proctored sessions, including instructor controlled settings
- disclosure, retention, and disposition of proctored session recordings

This PIA excludes review of

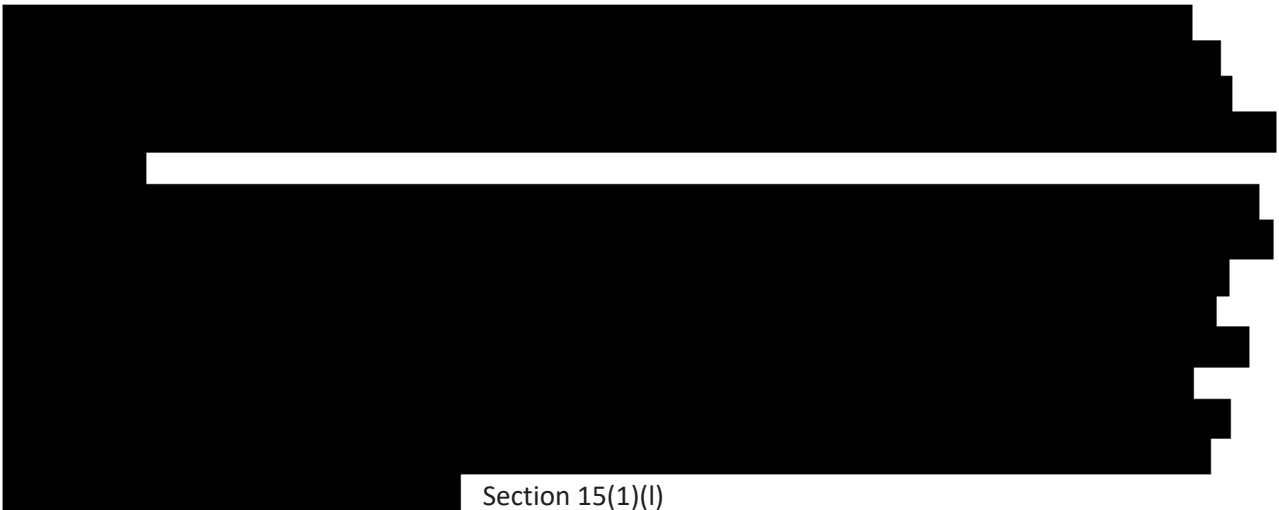
- privacy and security of the Moodle LMS
- GOOGLE's CHROME web-browser which is required to participate in the PROCTORIO proctored quiz, test, or examination
- students' use of their personal GOOGLE or CHROME account to sign-in to CHROME when taking a proctored quiz, test, or examination
- physical security measures of a student's environment and computer
- logical security measure of a student's computer

This PIA also excludes review of the processes in regards to reviewing recordings of proctored sessions, as well as reviewing methods students may employ in attempts to defeat the proctoring services in order to cheat on a quiz, test, or examination.

3. Related Privacy Impact Assessments

Does Selkirk have a PIA for Moodle?

4. Elements of Information or Data



Section 15(1)(l)

Selkirk will not use PROCTORIO's human ID verification process, plagiarism detection service, or anomaly review service (human-based or automated analytics).

The following information and data elements are collected and used for the PROCTORIO online proctoring session.



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Moodle Integration

Moodle shares information necessary for proctoring of the quiz, test, or exam and for associating the proctored session recording with the appropriate student. Information shared includes the student's ID number, course reference, and quiz reference information.

In overview, the personal information shared with PROCTORIO from Moodle, are:

- Course identification code(s)
- Exam identification code(s)
- Student name and ID number
- Instructor name and ID number

Student Identity Verification

As part of the registration and identification process, PROCTORIO will collect the following information via the web-cam on the student's computer:

- [Redacted] Section 15(1)(l)
- [Redacted] Section 15(1)(l)
- [Redacted] Section 15(1)(l)

Proctored Session Recording

- [Redacted] Section 15(1)(l)



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[REDACTED]

Section 15(1)(l)

This information will only be recorded if the instructor has enabled the appropriate settings within the exam. The recordings, and therefore the above personal information, are stored and accessed in Canada.

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 unsigned to PCT at pia.intake@gov.bc.ca. A privacy advisor will be assigned to your file and will guide you through the completion of your 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 of Canada (including back-ups and recovery)

At the time of this updated review, PROCTORIO has advised that it is hosted on Canadian instances of Microsoft AZURE services. UBC shared that they obtained an e-mail dated March 27 2020 from the Proctorio account manager / contact as confirmation of this advisement.

6. Data-Linking Initiative

This initiative is not considered a data linking initiative as contemplated in s.36.1 of FIPPA.

| | |
|--|---------------|
| <p>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. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.</p> | |
| <p>1. Personal information from one database is linked or combined with personal information from another database;</p> | <p>yes/no</p> |
| <p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p> | <p>yes/no</p> |
| <p>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.</p> | <p>yes/no</p> |
| <p>If you have answered "yes" to all three questions, please contact a PCT Privacy Advisor to discuss the requirements of a data-linking initiative.</p> | |

7. Is this a Common or Integrated Program or Activity?

This initiative is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.



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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/no |
| 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; | yes/no |
| 3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation. | yes/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. Risk Classification Level

The initial inherent risk classification level of this PIA submission was **VERY HIGH**.
The risk classification level of this PIA submission at closure was **VERY HIGH**.

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

Personal information data flow diagrams and tables were not available for this review.

10. Risk Mitigation Table

The following table indicates the associated risk levels as applicable and the potential or intended mitigation steps.

| Risk Mitigation Table | | | | |
|-----------------------|---|---|------------|-----------|
| | Risk | Mitigation Strategy | Likelihood | Impact |
| 1. | <i>PI stored / accessible outside of Canada</i> | <i>-Current services & recordings hosted / stored in MS AZURE Canada</i> <i>- Ensure human based services & analytics not used as these are hosted outside of Canada</i> | Low | Very High |



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| | | - Provision of privacy notifications in advance of students registering for e-proctored exam to provide assurance of FIPPA compliance | | |
| 2. | Unauthorized retention of PI | -Establish & implement retention policies & practices for recordings -Enforce minimum 1 year retention of recordings | Medium | Medium |
| 3. | Creation of new PI by data matching | Data matching performed is require to correctly & accurately associate recordings with the particular student and exam | Low | High |
| 4. | Unauthorized collection of PI | PI exchanged with Moodle is limited to that required to identify the student & associate the corresponding exam & proctored recording | Low | High |
| 5. | Excessive collection of PI | -Student may provide more PI than is necessary if they use a photo ID other than UBC Student ID card for ID verification process -Provide guidance / FAQ to students on how to ensure no PI appears in surroundings -Establish guidelines for instructors on exam monitoring settings | Low | High |
| 6. | Unauthorized use of PI | -Establish guidelines and controls for reviewing of recordings [Redacted] [Redacted] [Redacted] Section 15(1)(l) | Low | High |
| 7. | Unauthorized sharing / disclosure of PI | [Redacted] | Medium | High |



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|----|-------------------------------|---|-------------|-------------|
| | | Section 15(1)(l) | | |
| 8. | <i>Poor public perception</i> | <i>-Ensure appropriate notifications and consents are implemented</i> <i>-Provide FAQs for common concerns</i> | <i>High</i> | <i>High</i> |

11. Collection Notice

Instructor will be provided with a template cover letter to give to students informing them that a quiz, test, or exam will be proctored using PROCTORIO. The letter provides a general overview of the information that is collected and does not mention the authority under which the information is collected.

Instructors may adapt their cover letters, which may result in inconsistent or incomplete notifications between instructors. A standard privacy notification will be included in cover letters to ensure consistency and completeness across all courses which employ PROCTORIO for recording proctored sessions.

Teaching and Learning Institute (TLI) and departmental FAQs should be aligned for with the above-mentioned privacy notifications to ensure consistency and completeness.

Consent for Storage/Access Outside of Canada & Opt-Out Procedure (If Any)

Consent for storage and access outside of Canada is not required as the instance of PROCTORIO used by Selkirk College is hosted within Canada, and Selkirk is not using any other PROCTORIO services which would disclose personal information outside of Canada.

2.5 Consent Withheld Procedure

As the PROCTORIO services used by Selkirk College retain all personal information within Canada, a consent withheld procedure for disclosure of PI outside of Canada is not applicable.

Part 3 – Security of Personal Information

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

Physical security measures of the student’s environment and computer are not within scope of this review.

Section 15(1)(l)

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

Section 15(1)(l)

14. Does your branch rely on security policies other than the Information Security Policy?



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Please describe any specific policies and procedures and provide contact details for someone who could answer further questions regarding these policies and procedures.

15. 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] Section 15(1)(l)

[Redacted] Section 15(1)(l)

Selkirk College has not had visibility into or access to PROCTORIO’s own information security policies, practices, or standards. Published documentation asserts PROCTORIO employs robust standards and practices; however, these assertions could not be substantiated.

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

Student access to a proctored quiz, test, or examination is via Selkirk College’s Moodle LMS. Students require a valid CWL account to access Moodle and must be currently enrolled in the corresponding course for which the proctor session is offered.

Instructors access the PROCTORIO administrative console via Selkirk College’s Moodle LMS. Instructors require a valid CWL account to access CANVAS, and they must be currently employed by Selkirk College, and be the registered instructor for the corresponding course.

Part 4 – Accuracy/Correction/Retention of Personal Information

17. 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 ministry notify them of the update, correction or annotation?

The student sitting for a quiz, test, or examination is responsible for ensuring the accuracy of their personal information.

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

PROCTORIO may flag anomalies or potential anomalies during a proctored session, and instructors and others involved in evaluation of quizzes, test, or examinations may review such recordings to assess the flagged anomalies. Assessments may contribute to decisions or actions which impact the specific student’s grades and standing.



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19. 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.

For example: check to see that the information was obtained from a reputable source such as another government agency.

20. If you answered “yes” to question 17, do you have approved records retention and 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?

FIPPA section 31 states:

31. If an individual's personal information

a) is in the custody or under the control of a public body, and

b) is used by or on behalf of the public body to make a decision that directly affects the individual,

the public body must ensure that the personal information is retained for at least one year after being used so that the affected individual has a reasonable opportunity to obtain access to that personal information.

As recordings of proctored sessions may be used in assessments or decisions which potentially affect a student's grades or standing, the recordings of the proctored sessions must be retained for at least one year.

We understand through communication with UBC that recordings are retained on the PROCTORIO site for one year and a day. Selkirk College is in the process of policy amendment to ensure that the personal information is retained for at least one year after being used.

Part 5 – Further Information

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

The initiative does not involve the systemic disclosure of personal information.

| | |
|---|--------------------------|
| <p><i>Please check this box if the related Information Sharing Agreement (ISA) has been prepared. If you have general questions about preparing an ISA, please contact the Privacy and Access Helpline.</i></p> | <input type="checkbox"/> |
|---|--------------------------|

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

This initiative does not involve disclosure of personal information for research purposes.



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Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact a PCT advisor.

23. Will a personal information bank (PIB) result from this initiative?

No personal information bank will result from this initiative.

24. Other

PROCTORIO issued documentation and materials indicate that the required PROCTORIO web browser add-on can only be used with GOOGLE's CHROME web browser. PROCTORIO documentation indicates students must install the add-on to GOOGLE CHROME to use PROCTORIO and there is no mention of installing an equivalent add-on in other popular web-browsers.

FAQs and user guides from a few other North American educational institutions which use PROCTORIO explicitly mention that students must use the GOOGLE CHROME web-browser and specify that the web-browsers EDGE, FIREFOX, INTERNET EXPLORER and SAFARI cannot be used.

We understand from the UBC PIA that recent changes to CHROME Web Store may require students to sign-in with a personal CHROME or GOOGLE account in order to download the required PROCTORIO plug-in. Documentation provided by CHROME indicates that items in the Web Store can be downloaded without signing in if a direct link to the specific plug-in is used.

There are potential privacy concerns regarding use of GOOGLE CHROME, particularly if a student elects to sign-in to CHROME. Use of a GOOGLE or CHROME account may result in collection of other personal information by GOOGLE. However, such accounts are personal accounts created by the student and are not required by Selkirk College, nor does Selkirk have access to any of the personal information collected through use of such personal accounts.

Students should be advised not to sign into their personal CHROME or GOOGLE accounts to download the PROCTORIO plug-in, but rather to use the direct link provided by PROCTORIO.

Students should be advised not to sign into their personal CHROME or GOOGLE accounts when taking a proctored quiz, test, or examination.

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

Part 6 – PCT Comments and Signatures



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This PIA is based on a review of the material provided to PCT as of the date below. If, in future any substantive changes are made to the scope of this PIA, the ministry will have to complete a PIA Update and submit it to PCT.

Information or Materials Reviewed

Materials reviewed include:

- Invitation to Quote #5107 from Selkirk College
- Written response from PROCTORIO to Online Proctoring: ITQ #5107
- Instructor Guide to Proctorio at Selkirk College (*under development*)
- TLI links to videos explaining and demonstrating instructor set options for ID verification (*under development*)
- Selkirk websites providing faculty and students information regarding PROCTORIO (*under development*)
- Revisions to Selkirk College Policy 8613: Evaluation
- [REDACTED] Section 15(1)(l)

Additional overview information was obtained from the PROCTORIO website.
FAQs from websites of several other North American educational institutions (for comparison purposes).

6.2 Information or Materials Not Available for Review

The following materials were not available for review:

- Personal information data flow diagrams and tables
- Service agreement excerpts in regards to FIPPA compliance for data residency, disclosure, etc.
- Processes for storing and securing proctored session recordings retrieved from the PROCTORIO site
- Data retention processes, practices, and schedules for recordings of proctored sessions
- list of student-related data elements, although the review team expressed the belief that the list would be similar in nature to that for instructors

6.3 Analysis and Decision

The information provided for the review has established that PROCTORIO can be used in the proposed manner in compliance with FIPPA and the Information Security Standards. The following are the key factors in that determination:

- Personal information is collected, used, and disclosed in accordance with FIPPA
- Personal information is collected, stored, and accessed within Canada
- Access to Moodle, PROCTORIO, and the related files which contain personal information requires use of a valid Selkirk College CWL with appropriate access authorities
- Information shared between Moodle and PROCTORIO is limited to that required to identify the student in order to accurately and appropriately associate the recording of the proctored session to the corresponding student-course-exam combination
- Information is kept secure during transmission and at rest

Accordingly, PROCTORIO can be used as proposed subject to the conditions set out in the next section.

6.4 Conditions of Approval

The following conditions apply:

1. Publish FAQs and other guidance on TLI and departmental websites on the proper use of PROCTORIO. This should include guidance on the retention period for recordings of proctored sessions.
2. Require instructors to provide students with written guidance on how to use PROCTORIO, including a privacy notification as set out below, a copy of the direct link to download the PROCTORIO plug-in from the CHROME Web Store, and advice not to sign in to CHROME when sitting for a proctored session.



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3. Establish and communicate a standard privacy notification to be provided to students, which includes the following information:
- a) a description of the personal information collected and purposes for collection
 - b) a statement that Selkirk College collects the information for the proctored session under the authority of section 26(c) of FIPPA
 - c) contact details of a knowledgeable individual who can respond to questions and concerns regarding the privacy and security of the information collected

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|---|---|---|
| <p>Arleen Gallo</p> <hr/> <p>Executive Director, Human Resources</p> | <p>Arleen Gallo</p> <div style="font-size: small; color: gray; margin-left: 20px;"> Digitally signed by Arleen Gallo Date: 2020.10.13 07:16:08 -07'00' </div> <hr/> <p>Signature</p> | <p>October 13, 2020</p> <hr/> <p>Date</p> |
| <hr/> <p>Director or Manager Privacy, Compliance and Training Branch Corporate Information and Records Management Office Ministry of Finance (if Personal Information is involved in this initiative)</p> | <hr/> <p>Signature</p> | <hr/> <p>Date</p> |

Part 7 – Program Area Comments and Signatures



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| | | |
|--|--------------------|---------------|
| _____ Program Manager | _____ Signature | _____ Date |
| _____ Ministry Contact Responsible for Security (Signature not required unless MISO has been involved.) | _____ Signature | _____ Date |
| _____ Assistant Deputy Minister or Designate (if Personal Information is involved in this initiative) | _____ Signature | _____ Date |
| _____ Executive Director or equivalent (if no Personal Information is involved in this initiative) | _____ Signature | _____ Date |

A final copy of this PIA (with all applicable signatures and attachments) must be provided to PCT for its records to complete the process. PCT is the designated office of primary responsibility for PIAs under ARCS 293-60.

PCT will publish the ministry name, business contact details and a brief summary of the PIA to the Personal Information Directory (PID) as required by section 69(2) of FOIPPA. If you have any questions, please contact your privacy advisor at PCT or call the Privacy and Access Helpline at 250 356-1851.