

ProctorU – Project Privacy Assessment Report

Project Sponsor: Sarah Langlois

Department: Open Learning

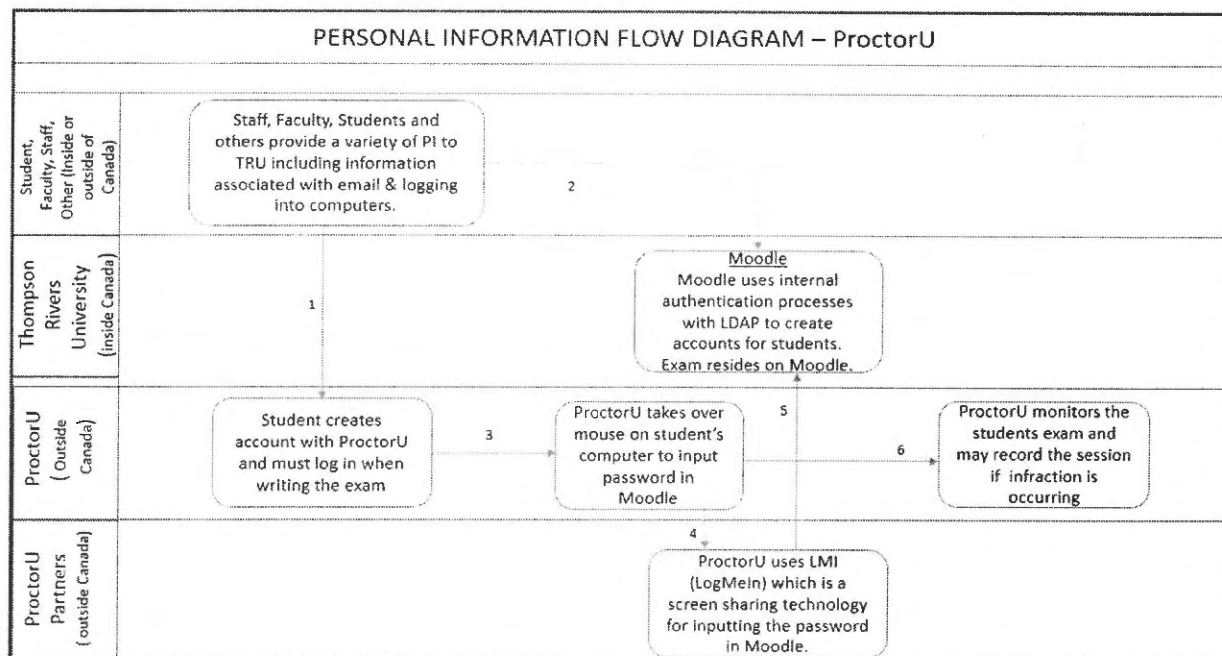
File #P17-02

Matt Dick

Date: June 9, 2017

Project Summary: It is reported that TRU Open Learning completes over 12,000 proctored exams annually. ProctorU is an cloud based virtual exam proctoring service located in the United States. To ensure the integrity of the online exam process ProctorU accesses and creates/collects personal information (PI) of students during the exam registration process (profile creation), verifying student's identification, unlocking the student's exam, and surveilling/monitoring and possibly recording the student and their computer system during the exam if the invigilator suspects student academic integrity behavioral issues. The first stage for this project is to run a pilot using TRU MBA students in Open Learning online courses.

Personal Information Data Flow:



It is understood that LogMeIn does not collect any PI from the student and is only a conduit for screen sharing technology.

Privacy Impact:

The TRU Project Privacy Assessment Gateway tool evaluates privacy in terms of impact and probability, and ratings fall into four Privacy Classification Categories: low, medium, high and very high. The PIA priority rating for this project is very high due to the substantial amount of PI that will be accessed and/or created/collected and stored by ProctorU outside of Canada

The types of student PI that will/may be created/collected and stored by ProctorU includes the following:

name	address	real-time video and audio surveillance and possible recording of the student's actions during exam.	access (viewing) of student identification (ID) to confirm student's identity (this ID will not be collected and stored by Proctor U).	surveilling (real-time viewing) and possible recording of all windows, applications, monitors and systems that are utilized by the student during the exam.
institution name	student number			
credit card number	notes regarding student's behavior			
user name	during the exam.			
password		Temporary remote control of student computer systems (allows invigilator to input exam password into the student's Moodle account).	360° scan of test environment at the request of the invigilator.	
email address				
phone number				

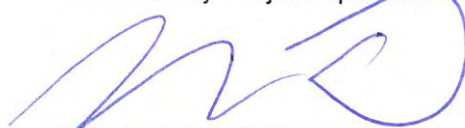
All information described above is PI as defined under the BC *Freedom of Information and Protection of Privacy Act* (FIPPA).

The TRU Information Security Office has found that based on the evidence provided by ProctorU they have reached a moderate level of maturity in their information security practices. There are still 20 items in the information security assessment (attached to this report) that have not been answered or do not meet TRU information Security expectations.

The purpose of this report and my role in reviewing this project is to point out privacy concerns with respect to the FIPPA, and privacy best practices. Identified privacy concerns along with recommendations are listed in the attached summary, and I would be pleased to assist you in enhancing your compliance with the FIPPA based on this report.

Respectfully prepared by:
Laurel Wale
Privacy and Access Officer

Received by Project Sponsor:



Project Sponsor

Please sign and return.

Proctor U Summary of Findings:

#	Issue	Recommendation	Rationale
s.13			
1			
2			
3			
4			
6			

s.13

7

8

9

From: [Hugh Burley](#)
To: [Matthew Dyck](#)
Cc: [Laurel Wale](#)
Subject: RE: Security information
Date: Friday, June 2, 2017 3:11:11 PM

Hi Matt,

I have finished a review of the responses to a request for additional material from ProctorU. These additional questions were introduced as it was not possible to determine current levels of information security from the minimal responses provided to the first 11 questions.

s.13

