

ACADEMIC COUNCIL REPORT

ACTION REQUESTED:

Recommendation
Decision
Discussion/Direction
Information

DATE: November 24, 2020

PRESENTED BY: Langis Roy, Deputy Provost

SUBJECT: Updated Virtual Proctor System Directives

COMMITTEE/BOARD MANDATE:

- In accordance with Article 1.1(f) of By-law No. 2, Academic Council has the delegated authority to establish and implement academic policy instruments, which is also reflected in the university's Policy Framework.
- The Policy Framework provides for relevant committees of Academic Council to serve as deliberative bodies for academic policy instruments
- The Graduate Studies Committee (GSC) and Undergraduate Studies Committee (USC) have reviewed the draft Remote Proctor System Directives and are submitting their recommendation for approval by Academic Council.

MOTION:

That pursuant to the recommendation of the Graduate Studies Committee and the Undergraduate Studies Committee, Academic Council hereby approves the Online Proctor Directives, as presented.

BACKGROUND/CONTEXT & RATIONALE:

- The E-Learning Task Force has examined issues related to the online/blended model of teaching that is necessitated due to public health measures currently in place. The E-Learning Task Force recommended that Legal Services review exam monitoring/remote proctoring tools to ensure that University policies address risk mitigation for issues including privacy.
- Exam monitoring/remote proctoring tools including Respondus Monitor and Proctortrack are being used by Ontario Tech course instructors to ensure academic integrity during the current remote/blended model of teaching. Current Final Examination policy instruments deal with in-person proctoring of examination rooms, not remote proctoring systems involving the collection of video and audio of students taking examinations.

- The University has privacy obligations under Ontario's Freedom of Information and Protection of Privacy Act (FIPPA). The Office of the University Secretary and General Counsel, including Legal Services and the Privacy Office have examined the technical, physical, administrative and contractual safeguards regarding both Respondus Monitor and Proctortrack. In addition to developing a notice of collection and FAQ regarding the use of these systems, the Office of the USGC has developed a draft Directive that will serve to put in place additional administrative safeguards to protect student privacy and fulfil privacy obligations.
- The Office of the USGC's review has concluded that both Respondus Monitor and Proctortrack can be used in accordance with FIPPA, provided the draft Directive is enacted.
- The Directive establishes a framework of privacy risk mitigation strategies to be applied to existing tools and to any new tools that may be brought forward in the future. Although it may need to be reviewed and updated, the strategies it applies will allow flexibility as new technologies and tools are adopted. Strategies set out in the directive include:
 - A requirement for new proctoring tools to undergo an assessment by the Privacy Office.
 - Placing restrictions on the type of biometric data that can be collected by any tool for the purpose of authentication.
 - Placing restrictions on which members of Ontario Tech teaching staff are authorized to use data collected by the tools, and the purposes for which the data can be used.
 - Placing restrictions on copying or downloading data out of the system.
 - Ensuring that students are informed of the use of these tools in certain courses by requiring that course instructors who choose to use the tool understand that they must place a notice of collection and use in their course outline.
 - Requiring a list of behaviors that will trigger the system to be published on the University website.

Six Month Review Period

- We are adopting a six-month review period for the directive, as suggested by members of Academic Council. During the review period we propose the following steps:
 - **Technical consultation with ITS:** Students have raised concerns the software from a technical standpoint, including computer slowdown, crashes, and changes to the registry. We will request that ITS examine these issues related to both Respondus Monitor and Proctortrack.
 - **Strategic discussion of alternate forms of assessment:** We recommend that AC Steering Committee consider scheduling a strategic discussion at AC on virtual proctor software and alternate forms of assessment.
 - **Student consultation:** We will engage with the OTSU on a process to involve students in policy consultation on any revisions to the Directive arising out of the review period.
 - **Enhancements to policy consultation (*Outside of the scope of the Directive*):** We will schedule a review of the policy consultation process at

a meeting of the Policy Advisory Committee to ensure students have an adequate opportunity to provide their perspective on policies that affect them.

- Following the review period, we will submit a report to AC on the results of consultation, including direction from the strategic discussion, technical consultation and student consultation. This report will include a recommendation on whether the directive should remain in force as is, in a modified form, or be rescinded.

CONSULTATION:

- Developed in consultation between E-Learning Task Force, Legal Counsel and Privacy Office.
- Academic Council – August 25 & October 27 for consultation
- Online Consultation – August 31- September 11
- Administrative Leadership Team – September 15 for consultation
- USC – September 15 for deliberation
- GSC – September 22 for deliberation
- November 10 to 16 – solicited written comments from Ontario Tech Student Union and student members of Academic Council/committees.

Summary of Comments and Responses

- November 10 to 16 Consultation Period:
 - We did not receive any written submissions from the Ontario Tech Student Union or student members of Academic Council/committees.
- Online Consultation:
 - Comments expressed concern that some students will have insufficient upload speed for use of virtual proctor systems.

Response: We have examined the upload speed requirements for the virtual proctor systems proposed for use, which require a maximum of 400kbps upload. Ontario Tech's Remote Learning website recommends an internet speed of 3.5 mbps download. Internet plans that offer sufficient download speed to meet that recommendation, also generally include 500kbps or greater upload speed.

- If the use of a virtual proctor system is not mandatory, should this policy instrument be reclassified as a guideline?

Response: This directive is intended to enable and regulate the optional use of a virtual proctor system during examinations, not to dictate that all course instructors must use such a system. There are many ways to ensure academic integrity, and many ways to structure assessments, which may be selected at the course instructor's discretion. If a virtual proctor system is used, there are mandatory conditions and processes, set out in the directive that must be satisfied.

- There are methods to circumvent online proctor systems.

Response: We recognize that these systems are not foolproof, and that they may be overcome through technical means. Any student who attempts to circumvent the virtual proctor system would be subject to investigation and consequences under the Academic Integrity Policy and the Technology Use Policy.

- Undergraduate Studies Committee:

- A member asked if there was sufficient consultation with course instructors using virtual proctor systems.

Response: This directive was developed based on the recommendations of and reviewed by the E-Learning Task Force and reflects comments from task force members. The membership of the task force was selected in order to have representation from all Faculties, and with experience with remote learning.

- Graduate Studies Committee

- A member asked if the directive addresses online proctoring using systems other than virtual proctor systems, for instance live monitoring using a webcam.

Response: We have revised the title and scope and authority of the policy instrument to reflect that this directive only addresses the use of virtual proctor systems as described in the directive.

- Academic Council

- Members expressed concern that there was inadequate student consultation.

Response: We have reviewed the consultation process and confirm that it was compliant with the Policy Framework. Although the Policy Framework process was followed, there were no student members on either USC and GSC in September. The directive was also reviewed by Academic Council, and there were student representatives on AC in August.

- In order to ensure that student voices were heard, we have undertaken additional consultation, soliciting comments from the University Student Union and student members of AC and AC committees where possible. Comments received and responses to those comments are documented in this report.
- We are asking the university's Policy Advisory Committee to discuss the consultation process and advise on whether it should be modified to include more student consultation overall.
- Members asked for clarification that the use of remote proctoring systems would be optional. Members noted that the use of the term "required" needs further clarity, and should be revised to "required by the course

instructor”, and suggested revisions to the Scope and Authority section.

Response: We have adopted the proposed language to clarify that the use of the remote proctor system is at the course instructor’s discretion (modifications to sections. 3, 5.1, 5.2).

- Members asked for clarification about the definition of Biometric Data, with some members suggesting that all of the data collected by remote proctor systems would be considered Biometric Data.

Response: We have revised the directive to distinguish between session data which is processed to flag potential violations and Biometric Data collected for authentication or identification purposes. Some remote proctor software can be configured to use knuckle prints and similar Biometric identifiers for verification purposes. After a review of the system, the Privacy Office determined that this data is unnecessary for authentication purposes. The directive prohibits the use of such identifiers, and instead uses photo ID and video image for verification purposes. This is consistent with the requirements of existing policy instruments regarding identity verification at final examinations. Unless the directive is modified, the use of finger or knuckle prints to verify identity would be prohibited in any future remote proctor tools.

- Students raised concerns about the operation of remote proctor tools from a technical standpoint, including reports of remote proctor tools causing crashes, system slowdowns, registry changes and other issues.

Response: We have requested a review of these technologies by Information Technology Services for their assessment of these reports.

- A member asked how to address suspicious activities that are flagged and to decide what constitutes academic misconduct.

Response: The tool uses automation to identify activities that may be misconduct, but the directive requires that an assigned Online Proctor review flags to determine whether they indicate misconduct or not. We anticipate that a review by a course instructor or TA will find some flags that are clearly not indicative of misconduct. Student comments have identified scenarios that may trigger a flag but that would not indicate misconduct, including tics or wandering eyes due to Tourette Syndrome and ADHD; mouthing questions; looking away from the screen to think; drinking water. The requirement for an individual to review flags is essential to allow consideration of the range of behaviors that are not indicative of misconduct, but that might be flagged, including behaviors related to disabilities. Additionally, students may seek accommodations related to functional limitations that may trigger flags, in accordance with procedures for Academic Accommodations for Students with Disabilities.

- A member said that the terms Security Settings and Optional Settings are confusing, and that sections 5.6 and 5.7 do not provide sufficient guidance.

Response: The definition of Optional Settings is “configurable settings relating to test parameters, such as but not limited to whether physical books, digital resources, scratchpad tools, or handwritten notes are allowed.” Virtual Proctor Systems can be configured to allow for different formats of assessment, and the Directive does not seek to limit course instructors regarding the format of the assessment, whether it is an open book exam, limited notes are allowed, etc. There are also Security Settings which relate to the authentication of the individual, room scan, etc. that should be uniform across the university.

- A member said that the university should not endorse any particular virtual proctor system because technology changes quickly.

Response: The directive creates a framework for the review of new technologies, and controls that can be applied to any new proposed systems. It is possible that a new proposed technology may create new issues that are not adequately addressed by the current draft directive, but it creates a baseline of protections that would be likely to apply to any new virtual proctor system.

- Ontario Tech Student Union

- The Student Union shared a document on October 8, 2020 that compiles the comments of 76 students regarding the use of Virtual Proctor Systems. We are attaching a copy of the document to this report, and respond to comments below.
- Students expressed concerns that the use of Virtual Proctor Systems exacerbate anxiety and stress around assessment.
- **Response:** We are sensitive to concerns around stress and anxiety especially during these uncertain times and encourage the development and use of alternate forms of assessment. The choice of assessment methods is at the discretion of individual course instructors, and may differ based on the requirements of the academic discipline or the course. The shift to alternate forms of assessment is a work in progress. Virtual Proctor Systems provide a method for maintaining academic integrity where alternate forms of assessment cannot be or are not used. A properly configured, functional and safety/privacy-compliant system – as is being deployed at Ontario Tech – along with the present directives on usage, are likely to reduce student stress and anxiety
- Students have raised concerns around the retention, storage and use of session data including videos and who is authorized to view the session data whether at Ontario Tech or at a third party.

Response: The Office of the University Secretary and General Counsel, with the Teaching and Learning Centre has developed FAQs for Proctortrack and Respondus Monitor (attached), which provide information on how session data is retained and used, who will have access to session

data and for what purposes, and restrictions on access by third parties. The Directive also enacts restrictions on which session data can be reviewed and by whom, and prohibits individuals from making copies of session data except for the purpose of an academic misconduct proceeding. Although documents and agreements with Respondus Monitor allow the use of images for research and development (without identity information such as name, student ID, course or marks attached), Proctortrack does not specify this as a permitted use for session data.

- Students have raised concerns around the cost of a webcam.

Response: The IT Services website includes minimum laptop specifications for BYOD Technology Enhanced Learning in Ontario Tech programs. These requirements include a webcam. Additionally, laptop rentals are available to accommodate students who might need a laptop for a limited time (subject to availability).

- Students have raised concerns that the prohibition on drinking water will cause additional stress and/or impact performance.

Response: Eating or drinking would be flagged by the system, but flags must be reviewed by an assigned authorized Online Proctor. Consideration can be given by course instructors to disregarding flags associated with drinking during an exam.

- Students have raised concerns about a lack of private, quiet space in their home to take exams using a virtual proctor system. This may cause flags due to the presence of other individuals or noises from other individuals.

Response: Students should let their teacher know when accommodation may be required. We acknowledge that there may be situations where a lack of private, quiet space may result in noises or presence of other individuals causing flags in an exam session. Where there is no request for accommodation, there is a safeguard: The requirement for a member of Ontario Tech teaching staff to review flagged exam sessions allows for the Online Proctor to make a determination about the nature of the flag and distinguish between violations of exam integrity and flags that do not amount to misconduct.

- Students have raised concerns about exams that do not allow backtracking.

Response: This is an example of what the directive defines as an optional setting that could be changed at the course instructor's discretion. AC members noted that in some disciplines, licensing tests take this format, so course instructors adopt the format to give students practice. As a matter of academic freedom, we will not adopt a restriction to prohibit this setting. We recommend Teaching and Learning Centre provide training to course instructors on configuring optional settings and allowing backtracking

where appropriate.

- Students have raised concerns that small movements or fidgeting will be flagged and used as evidence of academic misconduct.

Response: The directive was drafted to require the manual review of session data by an assigned Online Proctor. Although the software analyses sessions to flag behaviors, in no case should the virtual proctor system have the final say over whether to initiate an academic misconduct proceeding. This determination will be made by a member of Ontario Tech teaching staff.

- Students have raised concerns about technical issues, including crashes, losing connection during a test, internet connection and Wi-Fi problems, and computer slowdown. There have also been reports on the internet of permanent damage being done to computers of students at other institutions.

Response: We are engaging Ontario Tech IT Services to review the reported issues during the six-month review period. We will provide a report on these issues and make a recommendation as to the use of the two currently approved virtual proctor systems.

- Students have raised concerns that testing strategies such as reading questions out loud are not permitted.

Response: Students should let their teacher know when accommodation is required. In the event that accommodation is not sought, there is a safeguard: The requirement for a member of Ontario Tech teaching staff to review flagged exam sessions allows for the Online Proctor to make a determination about the nature of the flag and distinguish between violations of exam integrity and flags that do not amount to misconduct.

COMPLIANCE WITH POLICY/LEGISLATION:

- The draft directive will support student privacy, and ensure that the University and faculty can meet obligations under Ontario privacy law.

NEXT STEPS:

- Pending approval by Academic Council, the directive will be posted to the Policy Library.

SUPPORTING REFERENCE MATERIALS:

- Draft Virtual Proctor System Directive
- Proctortrack Student Feedback



Classification Number	<i>To be assigned by Policy Office</i>
Parent Policy	Examination and Grading Policy
Framework Category	Academic
Approving Authority	Academic Council
Policy Owner	Provost and Vice-President Academic
Approval Date	DRAFT FOR APPROVAL
Review Date	
Supersedes	

VIRTUAL PROCTOR SYSTEM DIRECTIVES

PURPOSE

1. The purpose of these Directives is to establish a process for oversight of online Examinations including Final Examinations using where the course instructor requires the use of a virtual Virtual proctor-Proctor systemSystem by students. Oversight is intended to ensure that academic integrity in Examinations is maintained, and that Examinations are conducted in a manner that mitigates privacy risks inherent in the use of Virtual Proctor Systems.-

DEFINITIONS

2. For the purposes of these Directives the following definitions apply:

"Biometric Data" means data regarding measurable physiological or behavioural characteristics that ~~can be~~ used to identify an individual. Examples of biometric identifiers include fingerprints, iris patterns, facial features, DNA, and voice signatures. Biometric identifiers are directly and intimately associated with the human body and cannot be easily hidden or changed.

"Examination" means a form of testing intended to assess the level of students' knowledge, ability, skills, comprehension, application, analysis, and/or synthesis of the subject matter in a course of study. This includes, but is not limited to in-person, online, take-home, practical, and laboratory Examinations.

"Final Examination" means an Examination scheduled during the Final Examination Period.

"Online Proctor" means a designated individual assigned by the Faculty to oversee the supervision of online Final Examinations. Normally, this is the course instructor and TA(s) assigned to the course. The Faculty may assign multiple individuals if necessary.

"Security Settings" means configurable settings relating to identity verification, such as the requirement for use of a webcam, a face scan, room scan or photo ID. These settings will be applied consistently across the University.

"Optional Settings" means configurable settings relating to test parameters, such as but not limited to whether physical books, digital resources, scratchpad tools, or handwritten notes are allowed. These settings will be determined by course instructors according to their assessment needs.

"Virtual ~~proctor-Proctor systemSystem~~" means an automated system that monitors examinations using student webcams, and records and analyzes exam sessions.

SCOPE AND AUTHORITY

3. These Directives apply to online Examinations including Final Examinations where the course instructor requires the use of a Virtual Proctor System by students.
4. The Provost, or successor thereof, is responsible for overseeing the implementation, administration and interpretation of these Directives.

DIRECTIVES

5. **Virtual ~~proctor-Proctor system~~System**
 - 5.1. A course instructor may choose to require the use of a virtual-Virtual proctor-Proctor system-System including video and audio monitoring ~~may be used~~ to oversee online Examinations. Monitoring by the ~~virtual-Virtual proctor-Proctor system-System~~ does not occur in real-time.
 - 5.1.5.2. Where a course instructor chooses to require the use of a virtual-Virtual proctor-Proctor system-System, this will be disclosed in the course outline in accordance with Ontario privacy law.
 - 5.2.5.3. Where a ~~virtual-Virtual proctor-Proctor system-System~~ is required by the course instructor, students will be expected to comply with the requirements of the system, including, as applicable, installing and running required software, turning on a webcam and remaining connected to the internet, for the duration of the Examination. Students will be expected to present photo ID, consistent with the Examination and Grading Policy and related procedures.
 - 5.3.5.4. The Chief Privacy Officer, or delegate will conduct a Privacy Impact Assessment on any proposed ~~virtual-Virtual proctor-Proctor system-System~~ before it is used for Examinations. This will include developing a recommended process for the use of the software.
 - 5.4.5.5. The Privacy Office will maintain and publish a list of authorized ~~virtual-Virtual proctor-Proctor systems~~Systems.
 - 5.5.5.6. The configuration of Security Settings of the virtual proctor system will be consistent across all courses offered by the University. ~~Biometric Data are worthy of the highest standard of privacy protection. In accordance with the principle of data minimization, the system will be configured to prevent the collection of Biometric Data.~~
 - 5.7. Optional Settings may be configured at the discretion of an individual course instructor, based on course requirements.
 - 5.6.5.8. Some Virtual Proctor Systems have the capability to collect and use Biometric Data for authentication purposes. Biometric Data are worthy of the highest standard of privacy protection. In accordance with the principle of data minimization, the

system will be configured to prevent the collection and use of Biometric Data for authentication purposes, with the exception of facial images.

5.9. The system will conduct analysis of a student's exam session to identify any suspicious events that may indicate exam violations have occurred. The University will maintain a list of those events deemed suspicious in a particular system, and make it available on the University's website.

5.7.5.10. The identification of suspicious events alone is not determinative of academic misconduct. A review by an Online Proctor is required to determine whether those suspicious events amount to a suspicion of academic misconduct.

5.11. Exam sessions will be reviewed by an Online Proctor where suspicious events have occurred.

~~5.8.~~

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6. Review by Online Proctor

6.1. Online Proctor(s) will be assigned by the responsible Faculty on a course-by-course basis. Online Proctors may be course instructors for a particular course, or assigned separately by the Faculty, and will need access to the course in the University's Learning Management System.

6.2. Online Proctors will use the system to make a note evaluating the suspicious events reviewed. Suspicious events may be deemed false positives. A false positive occurs when, after review, there is no indication that an exam violation occurred.

6.3. If an event is not deemed a false positive, the Online Proctor will, consistent with the Final Examination Administration Procedures determine whether to initiate an incident report by submitting an Incident Report – Violation of Examination Protocol Form to the Course Instructor or to the Faculty's Academic Advising Office where the Course Instructor is the Proctor.

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7. Academic Misconduct Investigation

7.1. Online examination incident reports will be reviewed, investigated and addressed in accordance with the processes set out in the applicable Academic Integrity Policy and associated procedures.

7.2. Where an investigation of academic misconduct is initiated, the Dean or delegate will direct the Learning Management System administrator to retrieve all relevant data regarding the incident. The evidence will only be shared and used in accordance with the process set out in the applicable Academic Integrity Policy and associated procedures.

8. Leaving the Examination Location during a Final Examination

8.1. Students are not permitted to leave the examination room during the exam, even briefly. This behavior would be flagged as a suspicious event by the system. When setting up the exam, course instructors are encouraged to allow for scheduled breaks to attend to any personal needs.

9. Retention and disposal of Virtual proctor system data

- 9.1. Session data collected by the Virtual ~~proctor-Proctor system-System~~ will be retained and stored only in the Virtual ~~proctor-Proctor systemSystem~~. Except in accordance with section 7.2, additional copies of session data outside of the Virtual ~~proctor-Proctor system-System~~ are not permitted.
- 9.2. Session data will be retained in accordance with a defined retention period that considers obligations under the Freedom of Information and Protection of Privacy Act and the minimum operational requirements related to academic misconduct and academic appeals, with a focus on data minimization.

MONITORING AND REVIEW

- 10. ~~These This Directive Procedures~~ will be subject to an initial review period of six months. Following the initial review, this Directive will be reviewed as necessary and at least every three years. The Provost and Vice-President Academic, or successor thereof, is responsible to monitor and review these Procedures.

RELEVANT LEGISLATION

- 11. Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Chapter F.31

RELATED POLICIES, PROCEDURES & DOCUMENTS

- 12. Examination and Grading Policy
Academic Conduct and Professional Suitability Policy
Academic Misconduct and Professional Unsuitability Procedures
[Incident Report – Violation of Examination Protocol](#)
Records Classification and Retention Schedule

Proctortrack & Online Exam Concerns Feedback

The following information has all be gathered from students via social media forms and direct messages. The content has been removed from the usernames as to respect the privacy of the students.

Twitter:

1. "Glad the OTSU is tackling this, online exams are a huge breach of privacy when we're asked for webcams on us and a scan of our room. Academic integrity is one thing but forcing students into surveillance and being watched for the entirety of that time is going way too far. Given that its Cyber Security Month its interesting how the school is neglecting to mention where and who that video data of our bedrooms goes to"
2. "I'm glad to see the OTSU tackling this issue. Everyone being stuck online due to the pandemic has resulted in our school stripping all students of their privacy with the excuse of preventing cheating on tests. This software we're using is not only ineffective but immoral as well. Students shouldn't have to be giving professors a tour of their rooms. Their computer files shouldn't be secretly tampered with to lock their systems down. Recordings of their faces shouldn't be sent to companies to support their research and development. What I'd like to see are dramatic changes to our course curriculums to reduce the need for software like this in the first place. This can be for as long as our education is still being handled remotely at the very least. Grades can easily be moved off exams and onto assignments.
3. Not being able to backtrack on questions is absurd if we are being monitored. It makes students panic and rush because they don't know what the other questions may be. You should be able to see all questions all at once. Makes no sense why we can't.
4. My son dropped an online psych course because his prof would not consult with IT so he could use his iPad for test☹️. He called IT and they agreed the issue was at her end(the prof) but she refused to make an effort to contact them. IT made a ticket but nothing happened.
5. I'm a pretty anxious person and usually have water with me to calm me down but proctortrack counts eating or drinking as cheating which is pretty unfair to me.
6. Students are at home and are going to be able to cheat if they really want to. I don't see what this accomplish other than making the testing process more stressful, and invading student's privacy. Course material needs to be redesigned to better accommodate WFH.
7. I'm a pretty nervous person in general and my eyes wander during tets. Makes me even more nervous when I'm being watched and could be accused of cheating even though I'm not actually cheating.

8. I agree, not being able to backtrack is a HUGE issue. This makes taking time-sensitive exams difficult. In addition, we should get some compensation from the school for buying webcams, as even the cheap ones are hard to find and are sold out in a lot of places.
9. I myself have ADHD, and even with physical, in-person tests, I find my eyes wandering in other places just for me to gather my thoughts (which, in some cases, might be considered cheating?) I feel like what one of my classes does (allows quizzes to be open book for students to further reference formulas) work WITH having to learn from home this year, since there are people at home who may have to do things outside school. (people are gonna find ways to cheat anyways, so...) However, if we're gonna be proctored electronically (there's bias in electronic proctoring, but that's 4 another convo tho), we should at least have our privacy sacrificed for the ability to backtrack. I'm rambling here now :P but anyways the best way to handle proctoring software is not to use it at all-test us on how we use the information we learn, not if we know it or not.
10. "Proctortrack is in essence a commercially distributed piece of malware and forcing students to download this program is completely amoral. Not only is the idea of providing root computer access to this program a significant privacy concern, but this software is also ableist. The facial recognition software employed by Proctortrack has no way to distinguish between students who are cheating and students with wandering eyes due to conditions such as Tourette Syndrome and ADHD. As someone with severe Tourette Syndrome I expect this software would repeatedly flag me for "cheating" due to tics. Instead of using this dystopian software, instructors should be shifting grades from exams to assignments or making all of their exams open book. Questions should be designed around applying knowledge instead of testing memory so that cheating is no longer an issue. Additionally, if instructors feel the need to use memory questions then they should have to roll the dice when it comes to cheating as employing such an invasive method and coercing students into agreeing to its use by making it necessary for exams is immoral and unbecoming of the university. I for one do not trust this commercial malware and if I am ever forced to download it I will be scouring my computer afterwards to ensure ever last file related to it is uninstalled properly."

Instagram:

What are some concerns you have with Proctortrack or the upcoming online exam season?

1. "Profs don't allow us to go back and answer questions"
2. "Provides unnecessary anxiety"
3. "I fidget a lot during exams so I'm really worried that Proctortrack will see it as cheating"

4. "It crashed so much, causing you to leave and return, but then you lose time and possibly the whole exam"
5. "Servers/laptops crashing like usual"
6. "It is so sensitive, anything can be flagged, they aren't allowing backtracking 😊 lots of pressure"
7. "It shutting down/reconnecting during a test and not being able to continue until it reconnects"
8. "The possibility of getting flagged for the tiniest movements"
9. "Thank You! Proctortack is HORRIBLE! It slows my computer down so much I can barely write"
10. "The system should be switched to a more stable alternative like respondus browser"
11. "Getting flagged for mouthing or reading questions out loud"
12. "Focusing on the software itself than doing the test/quiz, results in too much pressure"
13. "Trying to keep your eyes on the screen to not get flagged instead of focusing on question"
14. "Not being able to read questions out loud to yourself"
15. "No backtracking, increases the chances of mistakes >> lower marks"
16. "Not being able to look off the screen to think"
17. "Stress of being watched decreases concentration and ability to work well"
18. "Not being able to drink water in your own house"
19. "Do they store the videos of us"
20. "the teachers can see the recording anytime they want, however many times, its creepy"
21. Do 3rd parties get to look at the video"

22. "Not being able to complete test in silence because other people live in your home talk and have lives"
23. "Why does my antivirus flag respondus as malware"
24. "Worried you're gonna get flagged for any slight noise or movement"
25. "Privacy issues with webcam"
26. "When I look down to write the solutions it flags me as cheating. Why are we even using webcams?"
27. "I'm not comfortable with respondus monitor webcams on. Lockdown browser is fine"
28. "OMG ITS SO STUPID PLEASE GET RID OF IT, THERES NO POIINT IN STUDYING"
29. "Having to Install it on my personal computer, giving it access to sensitive information"
30. "We should be given the ability to back track. We don't always know how to answer immediately"
31. "Not for proctortrack, but instead for respondus. It can lock people permanently out of computers"
32. "Possible privacy violations"
33. "I'm not able to backtrack to review my answers and every small movement can get you flagged"
34. Lack of privacy, not everyone has access to an empty room"
35. Sometimes it doesn't let you into the test, responsud monitor is way better!!
36. It gives them far too much access to your computer & a major privacy breach
37. I'm worries about how professor will respond if you lose internet connection
38. It glitches a lot meaning I could be unable to finish my exams in time!
39. I was doing a practice test and the code wouldn't copy I did the setup 5 times before pasting the code into the search bar to realize it wasn't copying the access code and took me awhile to figure out how to get rid of what I copied. It wasted so much of my time and by the time I was performing my actual test I was exhausted. This experience made me realize there's so much that could go wrong

40. Having time to study
41. Loss of invigilating hours that TAs are promised ☹️
42. I feel having exams that use webcams is a privacy issues
43. A lot of people cannot afford a webcam and do not want to borrow a laptop during covid
44. It is unfair that some classes use webcams and others do not. This leads in inequality
45. Not being able to drink water or talk to myself/repeat questions out loud
46. Getting flagged for reading a question aloud
47. So many its hard to count half the profs don't even use the programs we pay for as well
48. Wat if I'm looking up or just closing my eyes and thinking just like in an exam room?
49. Proctortrack causes a lot of stress and takes my focus away from the test
50. Proctortrack is difficult and time consuming to set up
51. It is hard to get a whole household to be quiet while doing a test with proctortrack
52. Proctortrack is extremely sensitive to even the smallest movement
53. My parents work programs interfere with it, so I can only use it outside of work hours.
54. No eating or drinking rule causes me stress
55. For certain classes it makes me scan my ENTIRE room, kind of a violation or privacy
56. I can't use test taking strategies like reading questions aloud
57. Invasion of privacy
58. Poor wifi
59. Crashes constantly
60. Takes forever to start

61. It causes pop-ups and doesn't allow them to be block
62. I keep looking at myself in the little window instead of doing the test so I look so sus lol
63. It glitches a lot and flags EVERYTHING
64. It increases anxiety before an exam Cuz u can't focus on Ur assessment when ur too worried about staying in the frame or not making weird noises. Instead we should just use a software that monitors our screen. Recording us is unnecessary cuz profs randomize every question and can only answer one at a time. All my quizzes have gone horrible due to how time consuming the set up is
65. It's a breach of privacy, it makes me extremely uncomfortable and that affects my test taking
66. The webcam and sound... I have roommates

Proctortrack Student FAQ

1. Why is Ontario Tech using video and audio monitoring software?

Due to the orders and directives issued by the Government of Ontario, and relying on advice of public health authorities as it relates to COVID-19, Ontario Tech is unable to administer in-person assessments at this time. Video monitoring through software is viewed to be an integral part of the transition to blended learning. Use of this software allows the university to maintain the academic integrity of its assessments, while protecting the health and safety of all of its members by adopting the recommendations for physical distancing during the pandemic.

2. What information does the video and audio monitoring software collect about me?

During your assessment while Proctortrack is enabled, the software collects video and audio recordings captured by your webcam and microphone, images of your computer's desktop, an image of your student ID, and data regarding your activity, including eye movement and the time taken by you to answer specific questions. The software also uses automated processes to help authorized Ontario Tech personnel to evaluate the recordings.

Student identifiable information including name, grades, course name, and photos taken for identification cards is only accessible through Ontario Tech's Learning Management System (LMS) by authorized Ontario Tech personnel. Proctortrack cannot view or access your student information on the LMS.

3. Who has access to my video and audio recordings at Ontario Tech?

Only authorized Ontario Tech faculty or staff have access to view video and audio recordings of your assessment along with personal information such as your name. Authorization is granted on a course-by-course basis and is restricted to the following personnel:

- Your course instructor(s) and teaching assistant(s);
- Proctor(s) authorized by your Faculty;
- LMS administrators; and
- Faculty and staff responsible for the review, investigation and adjudication of allegations of academic misconduct pursuant to Ontario Tech's academic regulations.

4. How will Ontario Tech use my information?

Information will be treated in accordance with the Ontario's *Freedom of Information and Protection of Privacy Act*, the privacy law that governs the university. Every employee of Ontario Tech is subject to this law, which means that information will only be used by personnel who require the information to perform their duties and solely for the purpose the information was collected.

Assessments conducted through Proctortrack are not viewed or monitored in real-time like in-person assessments. Instead, the system is set up to generate data that flag any abnormal activity.

Audio and video recordings, along with the additional data generated by the software's automated processes, will be used by Ontario Tech for the sole purposes of improving educational processes and managing the academic integrity of its assessments by: (i) allowing authorized personnel to review, assess,

and analyze student performance and conduct; and (ii) using the relevant recordings as evidence for the purpose of investigating and adjudicating allegations of academic misconduct.

Images of student ID cards or government-issued ID will be used to ensure compliance with Ontario Tech's Examination and Grading Policy, which requires students to present student ID cards or government-issued ID to verify their identity at the beginning of each final examination.

5. Who has access to my video and audio recordings at Proctortrack?

Only authorized personnel will have access to video and audio recordings of assessments for the uses stated in Question 6.

6. How will Proctortrack use my information?

Proctortrack limits its use of information to purposes: (1) for which it has been given permission, (2) necessary to deliver the Services, or (3) as may be required or permitted for legal compliance or other lawful purposes.

Specifically, relating to the Services, information is used to:

- Improve and optimize the operation and performance of services;
- Diagnose problems with and identify any security risks, errors, or needed enhancements to the services;
- Detect and prevent fraud and abuse of services and systems;
- Collect aggregate statistics about use of the services; and
- Understand and analyze how Services are used

7. Do any other third parties have access to my personal information?

No. Proctortrack will not share recordings or personal information with third parties.

8. How is my information secured?

Proctortrack employs industry standard practices to protect your Personal Information in accordance with applicable law. Their practices are audited to review and verify the effectiveness of internal controls and processes on an ongoing basis. The audit covers internal governance, technical safeguards and internal control processes. Proctortrack has received SOC 2 Type 2 certification, which demonstrates that Proctortrack has appropriate system and administrative controls in place.

Within the LMS, student identifiable information including name, grade, course name, and photos that show identification cards can only be accessed by authorized Ontario Tech personnel.

Only users with instructor credentials for the LMS course (e.g., instructors, teaching assistants, proctors, LMS administrators) are able to view video sessions in conjunction with student identifiable information.

9. Can Proctortrack or the virtual proctor access or view any other files or data that are stored on my computer?

No. Although Proctortrack stores captured data locally on your computer before uploading to servers, Proctortrack does not access any data on your computer.

10. How can I further protect my privacy interests when taking an assessment online?

During the assessment, it is recommended that if possible you situate yourself in a quiet and unoccupied space, where other persons inside your dwelling will not be observed, and remove or conceal personal property bearing images or names (e.g. family photographs or signs) to further maintain your privacy.

11. Do I need a functioning webcam or microphone?

Yes. Both webcam and microphone need to be functional and enabled on your computer at all times during the assessment. If you do not have one or both of these capabilities, please contact your instructor.

12. How long does Proctortrack keep my information?

Your personal information will be retained by Proctortrack and Ontario Tech for one year after it is collected. This is consistent with Ontario privacy law.

13. Who do I contact if I have questions or concerns?

Please contact Dr. Susan L. Forbes, Manager, Teaching and Learning Centre at Susan.Forbes@ontariotechu.ca if you have any questions or concerns about the use of Proctortrack.

14. Are there any policy instruments that address the use of Proctortrack?

The university is currently developing a directive that will regulate the use of virtual proctor systems. A draft will be made available on the [Policy Office website](#) for community comments. We expect the directive to be presented for approval by Academic Council at its October meeting.