UNIVERSITY OF TORONTO
STUDENTS' UNION

UTSU Report on Online Proctoring Services

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Introduction & Background

The University of Toronto Students' Union (UTSU) represents over 38,000 full-time undergraduate students at the University of Toronto - St. George campus. In addition to administering services and hosting events for students, the UTSU also advocates on behalf of its members to the University administration and to all levels of government. In advancing the needs of the undergraduate student body in its capacity as a representative student government, the UTSU works on files including academic advocacy and issues of policy reform at the University of Toronto.

When the COVID-19 pandemic struck Toronto in mid-March 2020, the University of Toronto quickly cancelled all in-person classes. Within a short period of time, all undergraduate classes either moved to an online format or were cancelled entirely. Since then undergraduate classes have been taking place exclusively online with only some research operations being allowed to resume on campus. With the sudden shift to online learning, students, staff, faculty, and administrators struggled to keep up, and instructors and students alike faced a number of challenges, such as navigating asynchronous and synchronous learning structures, evaluation measures for participation grades, new lecture formats, accessibility, wifi connectivity, and much more. These challenges, and the decrease in the quality of education, led to calls for the University of Toronto to reduce tuition fees for classes operating remotely; a position taken by the UTSU and many other student organizations across the University.

In order to better understand students' experiences with online learning during the COVID-19 pandemic, the UTSU administered an Online Learning & Remote Classes Survey in August 2020, designed to collect feedback from students who had taken online classes either at the end of the Winter 2020 semester or during the Summer 2020 term. From the data collected, as well as data provided by the Rotman Commerce Students' Association, and emails from students to the UTSU Vice-President Public & University Affairs throughout the summer, the UTSU became aware of students' concerns regarding third-party digital proctoring services. These online proctoring services were being used by instructors to proctor their exams, tests, and assessments in an online environment, however there were concerns raised regarding privacy and data collection, and students were unclear of the policies that govern the use of these services at the University of Toronto.

On September 13, 2020, the UTSU Campaigns & Outreach Committee voted to commission two reports: one on online learning and remote classes, using the data from the survey, and the other report focusing on policies and practices that govern

the use of third-party digital proctoring services at the University of Toronto. The UTSU Report on Online Learning & Remote Classes, approved by the Campaigns & Outreach Committee on October 14, 2020, highlighted concerns around these third-party proctoring services, but determined that "the UTSU will need to look further into the issue of third-party proctoring services being used at the University of Toronto."[1]

This report looks at the University of Toronto's institutionally recognized third-party proctoring services as well as the policies and procedures that govern their use. This report also looks at the usage and implementation of these services across divisions and touches on recent notable data breaches of proctoring services, including ProctorU, in Ontario. Finally, the report provides recommendations to the University and its divisions on the use of these third-party online proctoring services moving forward.

This report is intended to be made public, and circulated widely amongst the University of Toronto community, including amongst central administrators, faculty administrators, course instructors and coordinators, faculty and collegiate student societies, and students at the University of Toronto.

The UTSU would like to thank the Arts & Science Students' Union, the Engineering Society, the Kinesiology and Physical Education Undergraduate Association, the Faculty of Music Undergraduate Association, the Students' Law Society, the Dental Students' Society, the Medical Society, the Nursing Undergraduate Society, and the Undergraduate Pharmacy Society for their contributions to this report. The UTSU would also like to thank the University of Manitoba Students' Union and the University of Ottawa Students' Union for their guidance on the issue of third-party online proctoring services during the COVID-19 pandemic and online learning.

For any questions regarding this report, please contact Tyler Riches, Vice-President Public & University Affairs, at <u>vppublicuniversityaffairs@utsu.ca</u>.

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[1] Riches, T., & Bienstock, J. (2020). *UTSU Report on Online Learning & Remote Classes* (Rep.). Toronto, Ontario: University of Toronto Students' Union.

Policy & Use of Online Proctoring Services at U of T

General Overview

University of Toronto central administration offices such as the Office of the Vice Provost, Students and Office of the Vice Provost, Academic Programs and Innovations in Undergraduate Education stress that all decisions regarding the implementation and usage of online proctoring services are made by the University of Toronto's various academic divisions.[2] Divisional and departmental level practices regarding online proctoring must be in line with general U of T policy documents such as the *Code of Behaviour on Academic Matters*, the *University Assessment and Grading Practices Policy*, and Provostial Policy on *Appropriate Use of Information and Communication Technology*, as well as in consultation with the Academic Integrity Committee.[3] The Centre for Teaching Support & Innovation as well as the Office of Online Learning Strategies create guidelines for the usage of online proctoring services and support divisional and departmental implementation.[4]

According to the Centre for Teaching Support & Innovation, the University has agreements with ProctorU, Examity, and ExamSoft, all of which "have been fully vetted for information security and data management practices."[5] The Centre writes that these services are used to "uphold academic integrity" and do so by a mixture of human and automated watching, recording, and flagging procedures; the services may also control students computers in some cases in order to execute this goal.[6]

The Centre also goes to some lengths to describe the shortcomings of third-party online proctoring services to discourage instructors from utilizing them in some cases.[7] In the Centre's own words, online proctoring is difficult to implement for the following reasons: students may not be able to meet the technical requirements necessary as a result of insufficient bandwidth and/or as a result of living in a remote area; students with accessibility needs may have a more difficult testing experience; students' anxiety may worsen as a result of being recorded and/or observed, and; technical issues may arise from having to onboard hundreds of students

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[2] Centre for Teaching Support & Innovation. (2020). *Online Proctoring*. Retrieved from https://teaching.utoronto.ca/ed-tech/online-learning/online-proctoring/.
[3] Ibid.
[4] Ibid.
[5] Ibid.
[6] Ibid.
[7] Centre for Teaching Support & Innovation. (2020). *Online Proctoring (eProctoring)*. Retrieved from https://teaching.utoronto.ca/teaching-support/strategies/a-i/eproctoring/.

simultaneously.[8] Moreover, developing assessments that utilize online proctoring while communicating expectations and requirements to students creates additional work for instructors.[9]

The Centre describes three main models that the third-party softwares utilize in order to administer exam sessions.[10]

- *Live Proctoring*: a human proctor onboards the student before the test and monitors them during it using the webcam and microphone. In some cases, proctors gain access to control the computer itself during the assessment. The session is recorded and reviewed with the proctor's discretion following the assessment.[11]
- *Live Launch & Review*: a human proctor onboards the student before the test, but automated services are used for monitoring and flagging during test taking itself. The human proctor remains responsible for reviewing the session after the assessment.[12]
- *Automated*: students self-onboard and then have automated monitoring during the test. Artificial Intelligence (AI) flags suspicious activity during the monitoring process but a human proctor is still responsible for reviewing the session once it is complete.[13]

Divisional and departmental units are ultimately responsible for implementing the use of online proctoring services. The service agreements for U of T students' usage of three approved vendors (ProctorU, Examity, and ExamSoft) allow for the costs of their services to be absorbed either by the appropriate division, department, or directly by students.[14] The costs of using online proctoring services vary depending on the desired proctoring intensity; for example, whether there needs to be a human proctor monitoring the entirety of a session.[15] Generally, pricing is determined per student, per hour of testing; tests can be booked for one, two, or three hour periods.[16]

The University expects divisions and/or departments who wish to utilize an online proctoring service to contact the Office of Online Learning Strategies for a

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[8] Centre for Teaching Support & Innovation. (2020). *Online Proctoring (eProctoring)*.

[9] Ibid.

[10] Centre for Teaching Support & Innovation. (2020). *Online Proctoring (eProctoring)*.

[11] Ibid.

[12] Ibid.

[13] Ibid.

[14] Centre for Teaching Support & Innovation. (2020). *Online Proctoring*.

[15] Ibid.

[16] Quercus. (2020, November). *eProctoring Service Options*. (PDF file). Retrieved from https://q.utoronto.ca/courses/46670/pages/examity.

consultation.[17] The Office provides information about the services available, costs, technical considerations, syllabus text outlining courses' use of these services, and helps facilitate communication on the matter with students.[18] Although divisions and/or departments are ultimately responsible for rolling out the use of a proctoring service, the Office of Online Learning Strategies acts as a liaison between the vendor(s) and divisional technical support staff.[19]

ProctorU

In using ProctorU, instructors choose between three models along the lines of what is described above.[20] Exams in which inappropriate behavior is reported are reviewed by human proctors within 72 hours and reported to the instructors.[21] Instructors can review live footage of students while they are taking their tests and rewind the recordings without disrupting the process; they can also choose to receive real time incident reporting.[22] Moreover, students have access to a chat function where they can express any concerns of their own to their proctors, and their instructors by extension.[23] In order to use ProctorU, students must download browser extensions for either Google Chrome or Firefox. The extension enables ProctorU to administer assessments and control or monitor students' computers for academic integrity purposes.[24, 25]

ProctorU has been audited by the University of Toronto to comply with Ontario's *Freedom of Information and Protection of Privacy Act*.[26] The University has a contract with ProctorU that ensures the service is in compliance with the standards set out in the Act, such as protecting the privacy of proctoring recordings and

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[17] Quercus. (2020). *ProctorU*. Retrieved from
https://q.utoronto.ca/courses/46670/pages/proctoru.
[18] Laurie Harrison (personal communication, November 18, 2020).
[19] Ibid.
[20] Quercus. (2020). *ProctorU*.
[21] ProctorU. (2020). *Live+*. Retrieved from
https://www.proctoru.com/services/live-online-proctoring.
[22] Ibid.
[23] Ibid.
[24] ProctorU. (2020, November). *ProctorU Google Chrome Extension*. Retrieved from
https://chrome.google.com/webstore/detail/proctoru/goobgennebinldhonaajgafidboenlkl.
[25] ProctorU. (2020). *Get the Firefox Extension*. Retrieved from
https://www.proctoru.com/firefox.
[26] Centre for Teaching Support & Innovation. (2020). *ProctorU: Privacy & Security Information Notice for Students*. Retrieved from
https://teaching.utoronto.ca/ed-tech/online-learning/online-proctoring/proctoru-privacy/.

students' personal information.[27] The contract has precedence over any of ProctorU's privacy policies as it is specifically tailored for the U of T community:[28]

- ProctorU collects personal information in order to confirm the identity of students' taking tests with them; the contract specifies that ProctorU cannot authorize use, collect, disclose, or destroy any of this information, directly or indirectly, without the University's consent.[29]
- ProctorU keeps students' profiles on file once they have used the service but only for as long as such students are enrolled at the University.[30]
- ProctorU is permitted to record and, at times, can directly access students' cameras, computer screens, and ability to navigate within their devices.[31]
- All recordings are available to designated staff and the University, including instructors, for 60 days after assessments.[32]
- ProctorU can keep recordings for no more than one year if academic integrity concerns are flagged in order to ensure enough time for all involved parties to properly assess them at a later date.[33]

The University is ultimately responsible for all data that ProctorU may have on its students, however, there is currently no concrete policy preventing it from using the data for other purposes.

Examity

In using Examity, instructors choose between five models of varying intensity, with fully automated and mixed options.[34] Before examinations, instructors can indicate which students have accessibility concerns so to ensure that their proctors know.[35] Exams are audited within 48 hours of completion; once they are audited, Examity has a flagging system of green (no incident), yellow (no cheating but a rule is broken), red (clear cheating behavior), and blue (technical issue).[36] Like ProctorU, Examity requires students to download browser extensions in order to utilize the

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[27] Centre for Teaching Support & Innovation. (2020). *ProctorU: Privacy & Security Information Notice for Students.*

[28] Ibid.

[29] Ibid.

[30] Ibid.

[31] Ibid.

[32] Ibid.

[33] Ibid.

[34] Quercus. (2020). *Examity Administrator and Instructor Manual.* (PDF file). Retrieved from https://q.utoronto.ca/courses/46670/pages/examity.

[35] Ibid.

[36] Ibid.

service which is how the service gains access to students' computers during assessment periods.[37]

Examity has not been widely used at the University, with the School of Continuing Studies being the only division to utilize the service.[38] Examity's services were temporarily shut down in March and no division chose to utilize the service during the summer, however it is currently in use with the School of Continuing Studies once again.[39] During that time, the Office of Online Learning Strategies focused primarily on building out the use of ProctorU for divisions that wished to use it.[40] Divisions who have wished to use Examity in the past have had to speak directly to the company.[41] However, currently, divisions are required to consult with the Office of Online Learning Strategies to engage in a consultation, as has been the usual procedure with ProctorU.[42] Specialists from the Office of Online Learning Strategies are currently working on building out a more detailed Information Notice for the University's contact with Examity, similar to the one already composed regarding the University's contract with the ProctorU service.[43] However, Examity's own Privacy & Security Policy says that the company does not share data with third-parties, analyze data, store data past the length of time deemed appropriate by individual universities, or use data to sell or market additional items to students.[44]

ExamSoft

ExamSoft also has a contract with the University, but unlike ProctorU and Examity, the service is not nominally supported by the Office of Online Learning Strategies.[45] However, ExamSoft is still an institutionally recognized platform; the Centre for Teaching Support & Innovation writes that it provides "an advanced solution for high stakes assessments."[46] Instructors who wish to use ExamSoft's services must gain

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[37] Examity. (July 2020). *Examity Google Chrome Extension*. Retrieved from https://chrome.google.com/webstore/detail/examity/kbmmbecgmmkedcifdommembgkeomigjf.
[38] Laurie Harrison (personal communication, November 18, 2020).
[39] Ibid.
[40] Ibid.
[41] Quercus. (2020). *Examity*.
[42] Ibid.
[43] Laurie Harrison (personal communication, November 18, 2020).
[44] Examity. (2020). *Privacy & Security*. Retrieved from https://www.examity.com/privacy-and-security/.
[45] Quercus. (2020). *ExamSoft*. Retrieved from https://q.utoronto.ca/courses/46670/pages/examsoft.
[46] Centre for Teaching Support & Innovation. (2020). *Online Tests & Exams*. Retrieved from https://teaching.utoronto.ca/ed-tech/teaching-technology/online-exams/.

approval from their divisional leadership and determine if its use will be funded directly by students or absorbed by their departments; fees are usually calculated on a per student basis.[47]

Instructors can choose two main ExamSoft models; one solution verifies students' personal information, while another uses AI technology to monitor and flag students in a live proctoring environment.[48] All AI monitored assessments that are flagged and reviewed by human proctors via session recordings and later referred to their instructors for further inspection.[49] Examplify serves as the primary application that students use to complete their proctored and/or monitored ExamSoft assessments.[50] Besides personal information, ExamSoft may also use collected data with third-parties if they are working with ExamSoft to improve their services; however, they will never sell data to third-parties.[51] They may also "improve [one's] browser experience by personalizing websites" and use it to improve their own services.[52]

Faculty of Arts & Science

According to information obtained by the Arts & Science Students' Union (ASSU), the Faculty of Arts & Science does not widely encourage third-party online proctoring services among its departments, citing Quercus' embedded test-taking functions.[53] The Faculty is actively working to ascertain why the utilization of such services might be deemed necessary by instructors in order to reduce further use in the future.[54] Currently, instructors that wish to use an online proctoring service must demonstrate why it is necessary for their course(s).[55] Faculty staff members in the Student Academic Integrity team are also currently looking into how online proctoring services flag students during and after tests; their main concerns being what constitutes a flag during the monitoring process and ensuring that students are adequately informed about what they should avoid for a more streamlined testing experience.[56] The Faculty has also said that not all models of online

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[47] Quercus. (2020). *ExamSoft*.

[48] ExamSoft. (2020). T*he Most Trusted Exam Solutions*. Retrieved from https://examsoft.com/solutions.

[49] ExamSoft. (2020). *Strengthen Exam Integrity with Digital Monitoring*. Retrieved from https://examsoft.com/solutions/exam-monitor.

[50] ExamSoft. (2020). *The Most Trusted Exam Solutions*.

[51] ExamSoft. (2020, May). *Privacy Policy*. Retrieved from https://examsoft.com/privacy-policy.

[52] Ibid.

[53] Arts & Science Students' Union. (2020). *ProctorU: Current Situation and Next Steps at the Faculty Level*. Internal memo: unpublished.

[54] Ibid.

[55] Ibid.

[56] Ibid.

proctoring are being entertained for use; for example, service models in which proctors are allowed to take control of students' computers and/change certain settings.[57]

> *"The proctor didn't set up my accommodations properly so I had to contact her after for more time" - 4th Year Humanities Student[58]*

> *"I didn't like giving access to essentially all of my personal computer, as well as being watched by a stranger with no relation to the University who could have been anyone. This ProctorU service also had major data breach before so I was very uncomfortable putting personal information on their site and giving them access to my data. It also made me perform worse, since it added a lot of unnecessary stress for being watched and because of technical issues that happened regularly. Also, they didn't allow the use of Linux, the OS I use, so I had to use a different OS I wasn't very familiar with, this also made it harder to take the test and slowed me down. I would like to never have to use that service again." - 3rd year Physical & Mathematical Science Student[59]*

Faculty of Applied Science & Engineering

According to information from the University of Toronto Engineering Society, the Dean of Engineering implemented a number of working groups to review Faculty policies and practices during the initial months of the COVID-19 pandemic.[60] Before the fall semester had begun, one such group made up of faculty, staff, and student representatives came to a decision regarding the utilization of online proctoring services in the Faculty.[61] The Assessments Working Group determined that the Faculty would not be widely encouraging the utilization of online proctoring services or supporting their usage logistically.[62] However, instructors would have the right to use a University approved company, which at the time was only ProctorU, due to

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[57] Arts & Science Students' Union. (2020). *ProctorU: Current Situation and Next Steps at the Faculty Level*. Internal report: unpublished.
[58] Riches, T., & Bienstock, J. (2020). *UTSU Report on Online Learning & Remote Classes* (Rep.). Toronto, Ontario: University of Toronto Students' Union.
[59] Ibid.
[60] University of Toronto Students' Union. (2020). *Online Proctoring Service Research Professional Faculties*. Internal report: unpublished.
[61] Ibid.
[62] Ibid.

Examity's prior service outage.[63] Any such instructors would need to liaise directly with ProctorU and ensure that they had sufficient financial and logistical support from their departments.[64]

The Engineering Society was only aware of a handful of instructors who indicated that they would prefer running their exams through ProctorU.[65] The Assessments Working Group set November 2, 2020 as the final date by which instructors would have to inform their students that they plan on using the service.[66] This date was set in order to ensure that students would have enough time to secure accessibility accommodations due to personal or logistical reasons, such as not having sufficient technology to complete their assessments.[67]

> *"Exams were scheduled well, although I had significant issues with accessing exam materials when using the ProctorU… service" - 4th Year Engineering Science Student*[68]

Other Professional Faculties

Architecture

In the Faculty of Architecture, usage of proctoring services such as ProctorU are not encouraged. If instructors wish to use it they must make arrangements with the company and organize the payment schedule with students and their department.[69]

Music

In the Faculty of Music, online proctoring services are not widely used. Proctoring for assessments is done through Quercus if at all; some students have reported that they were asked to turn on their cameras during tests.[70]

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[63] University of Toronto Students' Union. (2020). *Online Proctoring Service Research Professional Faculties*. Internal report: unpublished.
[64] Ibid.
[65] Ibid.
[66] Ibid.
[67] Ibid.
[68] Riches, T., & Bienstock, J. (2020). *UTSU Report on Online Learning & Remote Classes* (Rep.). Toronto, Ontario: University of Toronto Students' Union.
[69] University of Toronto Students' Union. (2020). *Online Proctoring Service Research Professional Faculties*. Internal report: unpublished.
[70] Ibid.

KPE

The Faculty of Kinesiology & Physical Education does not widely use online proctoring services.

Law

The Faculty of Law has been a longstanding user of ExamSoft proctoring services.[71] In the Faculty of Law, Examsoft/Examplify was historically used to lock students' computers for testing purposes to ensure students' could not exit the assessment page.[72] This year, the Faculty is mostly doing open-book assessments and as a result, the service is no longer locking computer screens to ensure that students can access their notes.[73] However, ExamSoft/Examplify still monitors the process and flags anything that looks like an academic offence.[74]

Dentistry

The Faculty of Dentistry does not use online proctoring services. However, students have reported that some instructors have required students to log onto Zoom with cameras on during assessments.[75]

Medicine

The Faculty of Medicine uses ExamSoft/Examplify's live testing features for full online proctoring; students are expected to take any and all notes in a designated note function on the application and are not allowed to take hand-written notes as that would be flagged by the proctor.[76]

Nursing

The Faculty of Nursing utilizes online proctoring services; under technical requirements on the Faculty of Nursing's website, the Faculty mentions that

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[71] University of Toronto Students' Union. (2020). *Online Proctoring Service Research Professional Faculties.* Internal report: unpublished.
[72] Ibid.
[73] Ibid.
[74] Ibid.
[75] Ibid.
[76] Ibid.

students' computers should have camera and microphone functionality to be able to participate in proctored testing.[77]

Pharmacy

The Faculty of Pharmacy utilizes ProctorU for some midterm assessments, and usage of the service is also mandatory for exams.[78] Some students showed support of the platform in the interest of academic integrity while learning remains online.[79] Students have also expressed concern about ProctorU's access to personal information and intrusiveness during the assessment process.[80] Students had concerns about being improperly flagged for looking away or down during tests, even if they are not looking at notes.[81] Members from the Undergraduate Pharmacy Society said that they were having ongoing meetings with the Faculty regarding online proctoring and mentioned that town halls were being planned to connect students with IT specialists who could better answer their questions about ProctorU.[82]

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[77] Faculty of Nursing. (November 2020). *Fall 2020/Winter 2021 FAQ for Students*. Retrieved from https://bloomberg.nursing.utoronto.ca/current-students/fall-2020-faq-for-students/.
[78] University of Toronto Students' Union. (2020). *Online Proctoring Service Research Professional Faculties*. Internal report: unpublished.
[79] Ibid.
[80] Ibid.
[81] Ibid.
[82] Ibid.

Online Proctoring Services & Data Breaches

In October 2020, the online proctoring company Verificient and its proctoring solution Proctortrack made headlines after a server hack that also resulted in an email blitz littered with racial slurs; the company's source code had previously been hacked and published online just one week prior.[83] The CEO of Verificient reported that the hack was a personal information breach but not a testing data breach.[84] Proctortrack is widely used at Western University; when the breach was reported, Verificent suspended service for 7-10 days.[85] Utilizing Proctortrack in this case not only meant that students' personal information was accessed and used by hackers, but some students' testing schedules were also inevitably altered due to the service suspension.[86] Western University has continued to use Proctortrack despite calls from students for the University to stop using the service.[87]

In July and August 2020, a hacker released a stolen database of nearly half a million ProctorU users dating back to 2012 and as recently as 2017; the database was one of 18 offered for free in online hacker forums.[88] The hack contained students' personal information including home addresses and the institutions they were affiliated with. [89] ProctorU confirmed the data breach in a tweet to a student newspaper at the University of Sydney, although the database contained information from several other institutions. The company said they were implementing "additional security measures to prevent recurrence."[90]

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[83] Abrams. L. (2020, October 14). Online proctor service ProctorTrack disables service after hack. *BleepingComputer*. Retrieved from https://www.bleepingcomputer.com/news/security/online-proctor-service-proctortrack-disables-service-after-hack/.
[84] Lupton. A. (2020, October 15). Western students altered about security breach at exam monitor Proctortrack. *CBC News*. Retrieved from https://www.cbc.ca/news/canada/london/western-students-alerted-about-security-breach-at-exam-monitor-proctortrack-1.5764354.
[85] Ibid.
[86] Ibid.
[87] Goveas. A., Rodrigues. R. (2020, October 27). Western to resume Proctortrack exams Thursday. *The Gazette*. Retrieved from https://westerngazette.ca/news/western-to-resume-proctortrack-exams-thursday/article_869c4842-18b6-11eb-9b21-57a9f775deb5.html.
[88] Abrams. L. (2020, August 9). ProctorU confirms data breach after database leaked online. *BleepingComputer*. Retrieved from https://www.bleepingcomputer.com/news/security/proctoru-confirms-data-breach-after-database-leaked-online/.
[89] Ibid.
[90] https://www.tomsguide.com/news/proctoru-data-breach

Conclusion

The UTSU's research into the policies, practices, and user experiences surrounding the use of third-party proctoring services at the University of Toronto has found substantiated concerns regarding the privacy of student data, both through recent breaches and through a lack of clear information from the University. Students have also expressed concerns around these third-party proctoring services having access to their computers during testing. This level of intense surveillance can lead to increased anxiety in students being assessed, which could have a negative impact on a student's results. Moreover, online learning has continued to create access barriers for low-income students and students in different time zones. Online proctoring only intensifies the inaccessibility of online learning by requiring students to complete assessments in normal time constraints but without appropriate internet connectivity or computer software.

The University of Toronto has made available a clear Information Notice for students outlining the use of ProctorU at the University. However, this Information Notice does not indicate that the University is restricted in any way from using students' data for anything other than for grading and assessment purposes. More concerningly, there are no Information Notices or additional information available for ExamSoft or Examity; ExamSoft specifically is rarely mentioned on the website of the Centre for Teaching Support & Innovation, despite seeing more widespread use than Examity.

Students at the University of Toronto have a right to opt-out of using Turnitin.com, an online service that checks for plagiarism. No such right to opt-out is guaranteed to students for third-party online proctoring services. Guaranteeing such a right to all students would allow for students to have greater agency over their privacy, device permissions, and data. Depending on the academic division, and even the specific department or course, a student may also be required to pay fees to either partially or fully cover the cost of using these third-party online proctoring services. Mandating the use of a service, and subsequently mandating payment for said service, is unfair under normal circumstances. This move particularly disadvantages low-income students, and there are no clear policies limiting how much a student could be charged for a third-party proctoring service. During the COVID-19 pandemic, however, this is deeply inconsiderate, as many students face financial difficulties, and the University of Toronto has not provided tuition relief, while ancillary fees have seen only marginal reductions.

Recommendations

Based on the research outlined in this report, the University of Toronto Students' Union makes the following recommendations to University of Toronto central administrators, faculty administrators, program departments, and course instructors:

1. Students in all academic divisions should be guaranteed the right to refuse to use a third-party online proctoring service, similar to students' right to refuse to use Turnitin.com despite instructions from their instructor.
   - Similar to the use of Turnitin.com, if an instructor mandates the use of a third-party online proctoring service, they must indicate so in the course syllabus, state that its usage is not mandatory, and indicate that an alternative option is available.
2. An Information Notice for Examity should be published and made available on the Centre for Teaching Support & Innovation website as soon as possible.
3. An Information Notice for ExamSoft should be published and made available on the Centre for Teaching Support & Innovation website as soon as possible.
4. The University of Toronto, and the Centre for Teaching Support & Innovation, should provide more information regarding the University's contract and relationship with ExamSoft, and the policies and procedures that govern the use of ExamSoft's services, and should make this information available on the Centre for Teaching Support & Innovation website as soon as possible.
5. The University of Toronto should provide and make available more information regarding authorizations by the University or third-party proctoring services for the use of student data by other third-parties.
6. The University of Toronto, its academic divisions, and departments should fully subsidize the cost of third-party online proctoring services. No student should be mandated to pay for the use of a third-party online proctoring service.

Addendum

Tuesday, December 15, 2020

Thorough research was conducted by the authors to ensure the accuracy of this report. Recommendation #6 was made because, while no cases had been found of a student being charged a fee for the use of a third-party proctoring service, the authors were unable to independently determine the existence of policies that prevented such a case from happening. Recommendation #6 sought to ensure that policies were put in place to prevent this.

Upon consultation with the Office of the Vice-Provost, Students, it was determined that the University of Toronto does have internal policies and fee approval processes that would apply to third-party proctoring services, and that under these policies, students would not be charged for the use of these services. Further, such a fee would run contrary to the Ministry of Colleges & Universities' *Tuition Fee Framework & Ancillary Fee Guidelines*.

Given this, the UTSU believes that Recommendation #6 is no longer relevant. All other recommendations remain unchanged.

References

Abrams. L. (2020, October 14). Online proctor service ProctorTrack disables service
        after hack. *BleepingComputer*.
        Retrieved from
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