

Privacy Considerations for Virtual Classes and Virtual Proctoring

As mentioned on Ryerson's [Privacy Policy](#) web page, Ryerson supports the closely aligned principles of transparency and accountability and is committed to protecting specific types of information, which include personal information, teaching and research records.

This privacy guideline is developed in an effort to assist faculty and instructors with their teaching activities and use of technologies in teaching, especially in response to remote teaching due to the Covid-19 pandemic.

Policies pertaining to this privacy guidelines are:

- [FIPPA \(Freedom of Information and Protection of Privacy Act\)](#)
- [Ryerson Privacy Policy \(Information Protection and Access - Restricted Information Policy\)](#)
- [Ryerson Privacy Procedure \(Information Protection and Providing Access to Restricted Information Procedure\)](#)
- [Information Classification Standard and Handling Guidelines](#)
- [Records Management Policy](#)

In teaching within both physical and virtual classrooms, the instructor is responsible for the careful and secure handling and storage of student personal information. This personal information includes, but is not limited to, student names, Ryerson usernames, email addresses, assessment grades and final grades, submitted assignments, discussion postings, online activities within the learning management system (D2L Brightspace), as well as any recordings of student voices, images, and their study environment or surroundings.

While students at Ryerson have been informed of the collection and use of their information (see [Registrar's Notice of Collection and Use of Student Personal Information](#), under the Current Student section), instructors still need to be mindful of managing student personal information in learning activities.

Virtual class using Zoom, Google Meet, or other web conferencing systems

Use of webcam

When running a virtual class or virtual office hours, considerations should be made as to whether the use of webcam is necessary.

Please note that to use a webcam, students require:

- a stable, high-speed internet connection (upload speed) that allows them to participate via webcam without significant delay or disruption
- a private and quiet physical space that they are comfortable sharing with their instructor and fellow students

If the use of webcams is necessary for planned learning activities or assessments, this should be mentioned in the course outline and a reminder should be provided prior to relevant classes.

Recording

Depending on the nature of the virtual session, recording may not be necessary. For example, virtual office hours do not need to be recorded. A virtual session may be recorded if it is part of a student's academic accommodation or is beneficial to students, such as recording a class meeting so that students who are unable to attend can review at a later time, or for difficult concepts that might require additional review. Recordings of lectures and review sessions can also be beneficial to students with disabilities, students who speak English as an additional language, or for review before an exam.

If a virtual class will be recorded,

- Students must be informed that the class will be recorded before or at the start of the class. A [notice to students](#) should include a notification that:
 - Anything presented and anyone speaking will be captured in the recording. If a student does not want their voice or likeness captured, they should turn off their camera and microphone. If audio or video participation is a course requirement, this should be noted in the course outline and discussed if students have concerns.
 - Sensitive personal information should not be discussed or shown during the recording.
 - Student identification should not be displayed to other students.
 - A chat log, including private messages, is captured as part of the recording.
- If covering sensitive or controversial topics, instructors should consider recording only their lecture portion, or allowing students to participate anonymously, depending on the activity. ([In Zoom, students can rename themselves](#). In Google Meet, this is not possible).

- If students will be required to participate during the recording, they should be given the option to use a pseudonym, though they must identify themselves to the instructor. The student may also opt to use only audio options (phone in or camera off) if video participation is not required.

After the session

Recordings of virtual sessions should be made available to students only within a secure system, such as D2L Brightspace or Google Drive ([Zoom recording](#), [Google Meet recording](#)).

The instructor is responsible for the retention and deletion of the recording in accordance with [Ryerson record retention schedule](#). To align with the [D2L Brightspace course shells life cycle](#), we recommend that the recording is retained no longer than 2 years after the recording is made.

Notes

- Recordings are subject to the Freedom of Information and Protection of Privacy Act (FIPPA), as well as University policies and guidelines.
- Recordings may only be used for the purpose for which they were obtained or compiled as reflected in the notice of recording.
- Those joining by phone will have their phone numbers masked. This is a default in Ryerson's Zoom and Google Meet meeting setting.

Automated virtual proctoring system

If after [careful consideration](#), automated virtual proctoring is deemed necessary for assessment, the following are elements of a virtual proctoring systems that require consideration of privacy concerns.

Student identification

In an automated virtual proctoring system, the identification process is done by students showing an ID card to the webcam. Students should use their Ryerson OneCard to identify themselves, if they have one. As an [exception to exam policy](#), while we are in a remote environment and OneCards are not being regularly issued, if the student does not have a OneCard, government-issued ID can be used, showing only the student photo and name (all other information on the card should be covered). Acceptable identification can be found on the [OneCard Office website](#). If a student is known to the instructor, it is acceptable for the student to write their student number on a piece of paper and show it to the camera.

Only the instructor and other teaching assistants or invigilating staff should have access to the ID information for the purposes of ID verification and must not use the information for any other purpose.

Use of webcam

The use of webcam is required when using a virtual proctoring system, for students to show their identification and a 360 degree view of surroundings in which they will complete the online exam. While completing the exam, the webcam is pointed toward the student's face and it captures the student's front view throughout the exam.

Recording

A virtual proctoring system records students completing the exam. It is important to inform students in the course outline that the exam cannot be taken without a recording. Therefore, a notice of collection must be provided to students ahead of the exam and should be posted in a prominent location within the learning management system D2L Brightspace ([Notice of Collection for Respondus Monitor](#)).