

**Hon. Ross Romano**  
Minister of Colleges and Universities  
Ministry of Colleges and Universities  
5th Floor  
438 University Ave.  
Toronto, ON M7A 2A5

July 2, 2020

Dear Minister Romano,

First and foremost, we hope that you and your family are doing well during these difficult times.

We write as representatives of the Ontario Universities and Colleges Coalition (OUCC)—which represents over 435,000 faculty, staff, and students from every public postsecondary institution in Ontario. We are alarmed by the growing use of invasive proctoring technologies during the forced shift to Emergency Remote Teaching (ERT) at our institutions. In particular, we are deeply concerned that the Ministry, through eCampusOntario and without consultation with sector stakeholders, is funding Proctortrack—a private, for-profit US-based company—on our campuses without any consultation.

We have significant privacy and security concerns about Proctortrack and similar proctoring software. Proctortrack collects a wide range of students' personal data including a copy of government-issued ID and biometric data such as scans of hands, knuckles, face and keystroke patterns. This puts students at risk of data breaches and identity theft. In addition, many students have reported feeling increased stress and anxiety when using proctoring software, compounding the heightened stress normally associated with exams.

While eCampusOntario ensures that any data retained by Proctortrack will be securely stored on Canadian servers in compliance with Canadian privacy legislation, students who were forced to use Proctortrack at York University had their data stored on a US-based server. York University later discontinued its use of Proctortrack.

In addition to being highly invasive of students' privacy and data security, ample evidence shows that the software is ineffective in providing the necessary safeguards against cheating. These shortcomings of the software's central purpose are yet more reasons to question the serious invasion of privacy and violation of data security brought about by using it.

The software also poses serious equity and accessibility concerns. The software requires students to have access to a computer with specific technical requirements including a webcam and microphone. The software also requires that students take the exam in a separate room that is entirely quiet, which may not be possible for students with young children and students with accessibility needs during the COVID-19 shelter in place orders. Moreover, some students may not have access to a device with the specifications required by Proctortrack, bringing into question the impact on low-income students and students without access to high-speed internet.

On campus, proctoring exams is often carried out by unionized workers, including teachers' assistants, invigilators, and Chief Presiding Officers. Especially in light of the glaring security concerns associated with the software, it is essential that university administrations and the ministry consult with campus unions to come up with a solution for proctoring exams during ERT that protects

good jobs on campus, respects students' privacy and data security and provides the integrity necessary for official exam proctoring.

We ask that the ministry prioritize protecting students' privacy and data security and that it consult with staff, students and faculty unions before proceeding with the introduction of this or any other similar changes to the teaching and learning process. Staff, faculty and students are keen to be part of the solution and call on the ministry to end its support of Proctortrack and other invasive technologies. The ministry must consult with campus unions to develop a safe and effective alternative.

Sincerely,

The Ontario Universities and Colleges Coalition

- RM Kennedy, Chair - Ontario Public Sector Employees Union (OPSEU) - College Faculty Divisional Executive
- Rahul Sapra, President - Ontario Confederation of University Faculty Associations (OCUFA)
- David Simao, Chair - Canadian Union of Public Employees (CUPE)- Ontario University Sector
- Harvey Bischof, President - Ontario Secondary School Teachers' Federation (OSSTF)
- Janice Folk-Dawson, Executive Vice President - Ontario Federation of Labour (OFL)
- Felipe Nagata, Chairperson - Canadian Federation of Students–Ontario (CFS-O)
- Kayla Weiler, National Executive Representative - Canadian Federation of Students–Ontario (CFS-O)
- Alex Silas, Regional Executive Vice-President - Public Service Alliance of Canada (PSAC National Capital Region)
- Sharon DeSousa, Regional Executive Vice-President - Public Service Alliance of Canada-Ontario (PSAC Ontario Region)