Accounting Technicians Ireland

e-Assessment Data Privacy Policy

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26th May 2021	M. Greenan	Revised to take account of new e-Assessment Platform provider Eintech (Rogo).
14th April 2022	M. Greenan	Updated for 2022 exams and revised to include Cirrus and Proctorio as e-Assessment Platform provider and AI invigilation.

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1. Introduction

At ATI we fully understand and embrace the challenges of tomorrow through our updated education offering that addresses the changing requirements of accounting professionals.

Our offering is digitally transformed to provide new ways of engaging with a more diverse cohort of learners through up-to-date content delivered via traditional and flexible learning models. The models strengthen the skills and competencies of students and members through enhanced qualifications geared towards employability, encourage life-wide learning, and provide clear pathways for those who wish to advance.

To this end, Accounting Technicians Ireland has transitioned from paper-based exams to e-assessment, introducing an online platform for all future exams.

The platform gives students the flexibility to take their exams from any suitable location and eliminates the need to travel to a centralised exam venue.

1.1 E-Assessment

- In order to ensure that exams are fair and that all students follow ATI's Rules and Regulations, the E-Assessment incorporates AI Invigilation, which ensures that each individual student is monitored while they take their exam.

- All students must follow the Exam Rules and Regulations provided on the ATI website www.accountingtechniciansireland.ie for the year that they are intending to complete their exam.

- Students who require reasonable accommodation will have greater flexibility to sit their exams and will have the option to have e-readers, larger font size and additional time should this be required. Students will not have to sit their exam in a stressful exam environment but from the comfort of their own home.

- Complaints, extenuating circumstances, or issues which arise during the exam can be investigated more definitively as there is a record of the whole exam experience.

- Best practice and recommendations for education in Ireland are clearly aligned with the direction of increasing the use of innovative approaches to teaching, learning and assessment. With this in mind, ATI is leading the curve in digitizing the assessment delivery to futureproof its qualification and make it more flexible not only for the student but for employers alike.

- The use of e-assessment allows students to receive their results and appropriate feedback in a timely manner.

1.2   Policy Aim

This policy gives guidance as to the data protection practices adopted by ATI in the management of student data in e-assessment delivery.

1.3   ATI's Commitment

Accounting Technicians Ireland will ensure that as a data controller it will meet all data protection obligations as laid out in the GDPR. The Data Protection policy can be found here and also extends to the personal data processed on the e-assessment platform.

The Institute has also put in place a Data Processing Agreement with its Data processor Cirrus related to e-assessment and will carry out periodic audits to ensure that the processing of data is done in accordance with GDPR.

2. Data Processing

2.1 Legal Basis

 ATI has identified a number of legitimate interests with regard to the transition to online examinations.

The following factors have led us to the decision to transition from paper led exams to an e-assessment environment.

- Increased security of exam script online as paper scripts are no longer transported via courier from the exam centre to ATI HQ and the risk of exam scripts being misplaced is mitigated with online exams via cloud technology. There is an increasing number of students each year requiring reasonable accommodation and finding additional rooms in exam venues where space is already at capacity was becoming increasingly difficult each year.

- The financial implications of renting additional rooms for the increasing demand of students requesting reasonable accommodation and the logistics of getting the papers, couriers and invigilators to a venue was increasing from year to year. The timetable scheduling of the exams in June, August and October meant that ATI was already competing with other Professional/Education bodies for these venues at the same time.

- As a result of the above transition from paper based to e-assessment, ATI will use the Cirrus e-assessment platform to allow students to complete their examinations online. In order for ATI to provide these exams, the Institute will need to use certain data provided to them by the student at registration and to collect additional data while the student is taking the exam. The data will be held

no longer than necessary to carry out the exam processing and in exceptional circumstances investigate issues that may arise.

The Institute has carried out a Legitimate Interest Assessment to ensure that the privacy and data protection rights of students are balanced with the requirement to process their data by the Institute. This analysis has led the Institute to conclude that it has a legitimate interest in processing student data in order to provide its examination function

2.2 Data Collected

The following data will be collected in relation to the e-Assessment

- Student Name
- Exam Number
- Email Address
- Contact Phone number
- Video and audio recording of the exam session
- Image of Identification Document
- Flags indicating non-conformance to exam rules

- IP Address from which the exams are taken
- Browser and Operating system of the PC
- Cookies are placed on the student's PC
- Exam Script
- Exam Grade
- Log files containing records of systems access
- Reasonable Accommodation adjustments

As per ATI's Rules and Regulations, information pertaining to a student's identity is collected during the registration process and is updated when a student updates their personal data in Source (CRM).

Images, video recording, non-conformance flags, IP Address, PC detail information and log data is recorded during the exam.

Exam script, grade and any adjustments made to the exam are collected in configuring the exam for students when students are taking the exam and when the exam is marked.

ATI will never disclose sensitive information to third party processors in relation to students who have requested Reasonable Accommodation.

2.3 Purpose of the Collection of the Data

The above stated data in 2.2 is collected to ensure that the exam is conducted fairly where all students have agreed to abide by the ATI Rules and Regulations.

E-Assessment is delivered by the vendor Cirrus who provides both the assessment platform and automated proctoring through its sub-processer Proctorio to ensure students' compliance with ATI's Rules and Regulations. ATI has minimized the data collected to that which is required to run a fair examination system.

The following data is collected in order to confirm the identity of the candidate:

- Student name and exam number
- Student email
- Image of Identification document

The following data is collected to contact students in the event that they get disconnected during the exam:

- Name and email address of student
- Contact phone number

The following data is collected to ensure compliance with our Exam Rules and Regulations:

- Video and Audio recording of the exam session
- Flags indicating non-conformance with the exam rules
- IP Address from which the exams are taken

The following data is collected in order to run the examinations and to ensure that students meet the required standard:

- Exam script
- Exam adjustments arising from reasonable accommodation
- Exam grade
- Exam number

The following data is collected to understand the platforms used by students and to ensure that the e-assessment system continues to meet their evolving technical needs:

- PC browser & operating system
- Cookies are placed on the student's PC

2.4 Data Retention

A student's personal data is retained for as long as it is needed to support the education and examination process.

The following data is held on the Cirrus Platform for 6 months after a student completes their examination with ATI to ensure adequate time for malpractice processes and exams appeals. It will be deleted after 6 months.

- Student name
- Student Email
- Flags indicating non-conformance with exam rules
- IP Address from which the exams are taken

The following data is held on Cirrus and will be deleted 6 months after an exam takes place:

- Image of the identification document

The following data is held on Cirrus and will be deleted 6 months after an exam takes place, to ensure adequate time for the malpractice process:

- Video and audio recording of the exam session

The following data is held on Cirrus and will be deleted 6 months after the publication date:

- Exam script
- Exam adjustments arising from reasonable accommodation

The following log data is stored on Cirrus' servers and is deleted after 6 months.

- Access logs to the Assessment system

The following data is stored on a student's PC and is not deleted, unless by a user:

- Cookies on the student's PC to ensure the effective operation of the exam software.

The retention periods outlined above will normally apply to the examinations process. However, where a breach of the Education Rules & Regulations is suspected, or where a student makes an application under the special circumstance process, then the Institute will retain the data for as long as it takes to complete an investigation and if necessary, until an appeal completes, including any referral for judicial action. In such circumstances, the Institute will download the student's data to their internal computer systems and remove it from the Cirrus system. Once any such examination review process has completed, the Institute will then delete the data from its own systems.

ATI E-Assessment Data Retention Schedule	
Data Retained on Cirrus Platform	**Retention Period**
- Student Name - Student Email - Flags indicating non-conformance with exam rules - IP Address from which the exams are taken - Access logs to the exam platform	**6 months**
Image of the identification document	**6 months**
Video and audio recording of the exam session	**6 months**

• Exam script • Exam adjustments arising from reasonable accommodation	**6 months**
• Access logs to the Assessment system	**6 months**
• Cookies on the student's PC to ensure the effective operation of the exam software.	**The following data is stored on a student's PC and is not deleted, unless by a user**

2.5 Data Location

To provide the e-assessment service, ATI has partnered with Cirrus the e-Assessment platform provider. Cirrus is the processor contracted by ATI to meet its data privacy standards and is audited annually to ensure these standards are met. The following information is stored by Cirrus in the EU and Ireland:

- Student Name
- Registration Number
- Email Address
- Video and audio recording of the exam session
- Image of Identification Document
- Flags indicating non-conformance to exam rules

- IP Address from which the exams are taken
- Operating system of the PC
- Cookies are placed on the student's PC
- Exam Script
- Exam Grade
- Log files containing records of systems access
- Reasonable Accommodation adjustments

Secure Certified Hosting

Cirrus assessment platform production environments are securely hosted by Cirrus' certified cloud hosting partner, Amazon AWS, in the EU (Dublin, Ireland, AWS Region eu-west-1), according to the industry standards and certification and information security controls - ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, CAS STAR CCM v3.0.1, SOC 3.

Processing Personal Data

When processing personal data, Cirrus uses appropriate security measures which include inter alia as appropriate:
- The pseudonymization and encryption of personal data.
- The ability to ensure ongoing confidentiality, integrity, availability and resilience of process systems and services.
- The ability to restore availability and access to personal data in a timely manner in the event of a physical or technical incident.

- A process for regularly testing, assessing, and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

Cirrus use Proctorio, a remote proctoring solution, integrated into the Cirrus platform.

Proctorio limits the personal data collected from end-users through their use of Proctorio's services. Proctorio only collects personal data as instructed by the Data Controller (ATI). Proctorio pseudo anonymizes specific test taker personal data.

Audio, video and screen recordings and images collected and stored by Proctorio are encrypted and can only be decrypted by ATI approved representatives.

Only the Data Controller (ATI) may request Proctorio to use Automated Proctoring during the administration of an exam. With Automated Proctoring, Proctorio is instructed to monitor test takers via a webcam, microphone, browser, and/or desktop in an effort to uphold the integrity of the assessment. This includes a scan of the test taker's surroundings, screen, and computer display. This monitoring will be automated. The test taker will be notified of this before the beginning of the exam. Only the Data Controller (ATI) maintains and controls the decryption keys necessary to decrypt test taker audio and video recordings and images.

Audio, video, and image files are encrypted prior to being transferred to Proctorio's cloud service provider in the location specified by the Data Controller (ATI). The files are stored on Proctorio's cloud service provider's serves in the EU, Dublin, Ireland.

2.6 Data Transfer

No data is transferred to third parties other than as described in Section 2.5 above.

3.Data Subject Rights

3.1 Summary

Data subjects have the following rights under the GDPR:

- The rights of access to the personal data controlled by ATI.
- The right to correct any inaccuracies in the personal data.
- The right to deletion of personal data or to restriction of the processing of the personal data.
- The right to data portability of the personal data.

Data subjects can contact Accounting Technicians Ireland in relation to the use of their personal data in the processing of their e-assessment examinations:

Telephone: 01 6498100
Email: dp@accountingtechniciansireland.ie
Address: 47/49 Pearse Street, Dublin 2

If you have any query or grievance in respect of the processing of your personal data, you have the right to lodge a complaint to the Data Protection Commission:

Telephone: 1890 252 231
Email: infor@dataprotection.ie
Address: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28