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**Studentenraad**

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Datum	29-04-2020	Ons kenmerk	1920-7
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Bijlage(n)	-		
Betreft	<b>Unsolicited advice Proctoring</b>		

Dear Geert, Karen and Jan,

As mentioned in the earlier sent unasked advice regarding the corona crisis, the Central Student Council (hereafter: CSR) is sending you a second unasked advice focused on proctoring. We also enclosed the letter of the Interstedelijk Studenten Overleg (ISO) regarding proctoring.

The council understands that these times are extremely challenging for the university as a whole. The CSR sees that staff and students are all working extremely hard to continue giving online education. We are proud and grateful when seeing such a resilient and flexible university. We are however highly concerned by the recent developments regarding the possible use of proctoring software at our university. Annemarie Zand Scholten, Miek Krol, Frank Benneker and Frank van Tatenhoven were kind enough to give us extensive information on the current pilots conducted with proctoring in our university. They answered all our questions during our last plenary meeting. Nevertheless, we are still highly concerned about some of the aspects of proctoring. Multiple questions and concerns have also been raised by several FSR's and the student community. In this unasked advice the CSR will therefore highlight its main concerns and recommendations regarding this new mode of supervising examinations.

### **Privacy**

The CSR believes that the use of proctoring software for examination is invading the privacy of students. Being filmed in your room as well as conducting a room scan and recording your computer screen during the entirety of an exam is far reaching and invades the personal space of a student. Other necessary measures that need to be taken (e.g. disabling your doorbell) can be difficult if not impossible and time consuming. The argument made by policy workers that you could clean up/rearrange your room as well as your computer to hide items that you do not want to be seen by other people is, in our view, not acceptable. A room of a student can be regarded as a personal sphere. Besides, there seems to be no thought given of students that live together in a studio, or students who do not have the opportunity to sit alone in a room with a table and a chair. Lockdown measures make it impossible for students to force possible roommates out of the house, or for the student themselves to go to a library or other place to take the exam.

In addition, we are concerned that students will be forced into accepting this type of examination, since no alternative testing method seems to be thought of in the case a student refuses to take this type of examination. We are strongly opposed to the idea that the only option for a student not willing to take an exam via proctoring will lead to a study delay. The CSR finds that providing students with no choice but to accept proctoring as a mode of examination in the current situation of a global pandemic is a too strict measure and compromises their privacy.



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### **Technological Issues**

The CSR is also heavily concerned with possible technological issues that could harm the examination process. The technological standard for successfully taking an exam while using proctoring software is quite high. One example is the required internet connection. A students' Wifi-connection has to be stable throughout the entire exam to ensure that there is an internet connection at all times, in order to not be excluded from the exam. Experiences with online meetings and tutorials have proven that this is nearly impossible, even with a relatively good quality internet connection. Besides, a substantive amount of (international) students have returned home on the advice of the university. It is very likely that some students have a bad or no stable internet connection at all in their place of residence.

Next, students need a webcam and a sufficiently up to date laptop or computer to take their exam on. Making sure a student has the sufficient hard- and software for taking an exam with proctoring software can be very expensive as well as time consuming (ordering items, delivery, etc). There seems to be no policy in place for students not residing in the Netherlands at the time of examination and who do not have sufficient hardware for completing the exam. It is also unclear what the measures will be if a student due to these circumstances is unable to take the exam. Another technological shortcoming that concerns the council is that students are not able to go back to questions in the exam. In normal exams, a student is always able to go back to a question or skip one in order to complete it at a later point in time. The CSR believes that this restriction will negatively affect the grades of students.

### **Unclear Rules and inconsistency**

The council also has concerns and questions with regards to unclear rules and possible inconsistencies across the university. In the current plans, students with special needs seem to not have been taken into account, or have not been clearly addressed. There seems to be no policy in place for when a student is unable to sit down for two to three hours straight due to caretaker responsibilities, medical conditions that require frequent bathroom use or other comparable situations.

What remains to be unclear for the CSR is possible discrepancies between courses, programs and faculties. To what extent is discrepancy able to occur? The council disapproves of different rules regarding examination, since this could cause even more confusion and stress amongst students. Some programs perhaps prefer even stricter proctoring rules, such as the usage of a room scan at the start of an exam. Next, the UvA manual on proctoring advises students to start uploading possible files ten minutes before the end of the exam. The CSR wonders whether the extra time necessary to complete an exam compared to a normal exam is taken into account when determining the length of the exam. Another related issue is that students are allowed to be 30 minutes late when taking an on-site exam. In the regulation for online proctored exams, students are only allowed to be 15 minutes late. Technical problems can however be just as challenging as a delayed train.

### **Stress and workload**

Proctoring has caused a lot of concern amongst the medezeggenschap as well as the student community. Students are not only worried about their privacy and not meeting the technological standards, but they also worry about possible errors that could occur during the exam, or wrongly being accused of fraud by the proctoring program. All these factors cause stress and could enhance mental health issues. When looking at multiple top rated universities across the globe, we see that they are using grading schemes which are not as harsh on students by using a pass/fail system, to limit stress.<sup>1</sup> Besides, the CSR was told that proctoring does not lead to a lowering of the workload for staff members who have to conduct their exams via proctoring software. The CSR therefore believes that this mode of testing causes an unnecessary amount of additional stress that both staff and students do not need in this current situation.

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<sup>1</sup> Article mentions grading schemes applied by Harvard and other top universities  
<https://news.harvard.edu/gazette/story/2020/03/harvard-college-adopts-temporary-grading-policy-for-spring-term/>



### **Possible alternatives**

The CSR believes that there are viable alternatives for conducting exams via proctoring. Some faculties are randomly selecting some students and calling them after they have handed in the exam. Through this way the teacher is able to ask questions in order to check whether the student cheated. If these random checks are conducted in a consistent and sufficient manner, it could successfully reduce the chance of students cheating. The “force majeure” hardship clauses of the OER and exam regulations which can even be used to allow more flexibility in supervision of the examinations and thus not need to implement stricter measures such as proctoring. The exam can then be taken in its original form, even if it is testing “basic knowledge”. Besides, many faculties have been conducting open book exams or other forms of examinations over the past weeks. According to the CSR, this proves that proctoring is not a necessity to prevent study delay. The use of proctoring software is a new method that has not been used and tested very thoroughly. It will yet have to be proven to successfully detect all possible ways of cheating. Finally, The CSR seriously doubts whether the benefits of proctoring outweigh the fundamental rights of students as described in article 6 section 1 under f of the *Algemene Verordening Gegevensbescherming* (AVG).

### **Conclusion**

In sum, the CSR is strongly opposed to the idea of using proctoring software for conducting exams. We, however, understand that it is difficult to find an alternative that suits all upcoming exams at the university. The council is therefore glad to be a part of the current discussion and decision making process at the university, in order to help and contribute to finding a solution that is workable for both students and staff, by being part of the relevant meetings and discussions regarding this topic.

If you however decide to continue this process of implementing proctoring, which we strongly advise you not to do, we urge you to look into and take action on the following issues.

### **The CSR advises the CVB to;**

- **Compose a privacy protocol which is provided to the students when asking for their consent on gathering their data.**
- **NOT implement the room scan when choosing to make use of proctoring software.**
- **Provide an alternative method if a student refuses or is unable to take an exam with proctoring. This alternative method can not lead to further study delay.**
- **Make a policy for students residing outside the Netherlands who are unable to acquire the sufficient hardware by themselves.**
- **Look further into the possibility of going back and forth between answers. If this cannot be changed, we advise you to compensate students in their grade.**
- **Align the exam regulations between normal on site exams and online exams, e.g. ensuring the same late-policy, letting every student start who are less than 30 minutes late instead of just 15.**
- **Make a policy for students who are unable to sit down for the duration of an online exam due to care caretaker responsibilities, medical conditions that require frequent bathroom use or other comparable situations.**
- **Look into the possible discrepancy that can occur between exams due to unorganized rulemaking regarding proctoring examination to limit confusion and stress levels amongst students.**
- **More actively include the faculty as well as central medezeggenschap in the decision making (and possible implementation) process of proctoring.**

We look forward to your reply.

Bedankt en sterkte in deze tijd namens de gehele Centrale Studentenraad,

Met vriendelijke groet,

Pjotr van der Jagt  
Voorzitter CSR 19|20