Dear Chair,

Thank you for the unsolicited advice on proctoring we received on 29 April. First of all, we understand very well that you are concerned about the privacy of students when using online proctoring. The Executive Board shares this concern and has therefore paid a lot of attention to privacy issues. The UvA sees online proctoring as a tool that should only be used if there is no good alternative.

Before making a decision on proctoring, the UvA focused on privacy issues in particular. For example, it has been established that the data will only be accessible to authorized UvA staff. The images are encrypted and are stored on servers located in the EU. After thirty days everything is automatically deleted. It has also been established that the images will never be used for anything other than detecting possible fraud. The solution meets GDPR requirements and the Data Protection Officer has given a positive advice.

We will respond to your suggestions point-by-point below.

*Compose a privacy protocol which is provided to the students when asking for their consent on gathering their data.*

There is a privacy statement describing how the UvA safeguards the privacy of its students. Students are not asked to consent to the collection of data. However, when taking a test with Proctorio, students must agree to the screening process. The privacy statement is published on the website. As mentioned above, the UvA has taken several measures to ensure privacy and security when using online proctoring. If students feel the need to protect their privacy further, the Student Manual contains tips on what you can do yourself to minimalize invasion of your privacy, e.g. shut down unused computer applications, clean up the room to make sure objects are not on the room scan.
Not implement the room scan when choosing to make use of proctoring software.

Turning off the room scan is technically possible. However, not performing a room scan makes it easier for students to defraud for example by hanging cheat sheets out of sight of the webcam.

Provide an alternative method if a student refuses or is unable to take an exam with proctoring. This alternative method cannot lead to further study delay.

For students in the Netherlands who cannot borrow a laptop or computer from family or friends it is possible to borrow or rent a laptop. If there are personal circumstances preventing a student from taking an exam at home, an option is offered to take it at UvA locations. For international students this is, unfortunately, not an option. Here is the option to move to an alternative location that meets the requirements.

Make a policy for students residing outside the Netherlands who are unable to acquire the sufficient hardware by themselves.

As noted above, it is feasible to use a location with the necessary hardware and network facilities. We expect this to be a problem on a small scale and ask faculties to look for a solution on a case by case basis.

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.

This is a matter of exam design and is separate from online proctoring. Exam design is a responsibility of the programs and education board within faculty. Online proctoring has no direct influence on the form and execution of the questions.

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.

Determining regulations for examinations is a subject for the examination committees and programs.

Make a policy for students who are unable to sit down for the duration of an online exam due to caretaker responsibilities, medical conditions that require frequent bathroom use or other comparable situations.

If there are personal circumstances that prevent you from taking an exam at home, an option is offered at UvA locations. Students should indicate in advance that these types of situations (may) occur. Students with a disability will also be taken into account.

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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.

The proctorio settings are primarily a matter for the faculty. UvA-wide guidelines are desirable, for example from the perspective of implementation of the service. We are investigating the possibility of drawing up these guidelines. Guidelines that can then be customized by the faculties into their local situation.

More actively include the faculty as well as central medezeggenschap in the decision making (and possible implementation) process of proctoring.

This is a valid point, but given the necessary speed of the process, it was difficult to organize the normal decision-making process. It would be good to involve the FSR in the faculty implementation processes. At the FEB this has also been done.

We hope that we have provided adequate answers to your concerns.

With kind regards,
the Executive Board,

Prof. Geert T.M. ten Dam,
President