



# Directive on the e-proctoring system

## I. Overview and features

1. The Geneva School of Economics and Management (GSEM) has set up an e-proctoring system using software provided by TestWe, a company with its headquarters at 6 Rue Notre Dame de Nazareth, 75003 Paris, France.
2. This system enables GSEM students to take their exams remotely, helps to prevent cheating, and complies personal data protection legislation (Geneva's cantonal personal data protection act (LIPAD) and regulations (RIPAD)). The system allows GSEM to hold computer-based exam sessions both in class and remotely.
3. The software has the following anti-cheating features:
  - a) The student's built-in or external webcam takes photos at random.
  - b) The student's built-in or external microphone picks up sound.
  - c) For closed-book exams, students are required to close all webpages and applications before they can start the exam.
  - d) For closed-book exams, students cannot open applications or webpages during the exam (the full-screen function cannot be deactivated).
  - e) In case of automatic processing (point 5a) :
    1. The student is identified by comparing a photo to one taken the first time they logged into the system.
    2. The system can detect if the student is not in front of the camera.
    3. It can detect if another person is within the camera's range.
    4. It can detect unusual sounds
    5. if an anomaly is detected (as per points e.1, e.2, e.3 and e.4 above), notifications are automatically sent to the proctoring team (the heads of IT support, IT services and Student Services, or a member of their team if they are unavailable).

## II. Personal data

4. The following personal data is collected by the system:
  - a) First name(s)
  - b) Last name
  - c) Email address
  - d) Student/applicant number
  - e) Related class
  - f) Related program
  - g) Related entity
  - h) Language
  - i) Exam answers
  - j) Exam grades
  - k) Identity document
  - l) Photos
  - m) Sound
  - n) IP address
  - o) Connection data.

5. Depending on monitoring modalities [hereby](#) announced, two different methods may be applied for photographic capture authentication purposes and to the compliance with the e-exam directive
  - a) a biometric processing which is in no case recorded, consisting in instant image comparison. A manual check is performed ex-post
  - b) a manual check is performed ex-post
6. Proctoring data (photos and sound) are encrypted and stored in Switzerland on the University of Geneva's servers. The exam papers are encrypted and initially stored with TestWe's hosting provider AWS; once the teacher has approved the grades and exported the grade table, the copies are stored on the University of Geneva's servers, also in encrypted format.
7. The data collected are processed only for the following purposes:
  - a) to enable the student to take their exams on a computer; and
  - b) to effectively prevent cheating by checking the student's identity and ensuring compliance with exam requirements.
8. Only the following individuals are authorized to access the photos and sound from the exam:
  - a) the head of IT support
  - b) the head of IT services
  - c) the head of Student Services
  - d) no more than two authorized TestWe staff members, for IT support purposes only and during the exam session only, and these staff members must be contractually bound by a non-disclosure agreement.

If one of the individuals mentioned in points a) to c) above is not available, they can be replaced by another member of their team. If one of the individuals mentioned in point d) above is unavailable, they can be replaced by another TestWe staff member, provided that staff member is contractually bound by a non-disclosure agreement.

The above does not apply if a student is suspected of cheating.

9. The data will be automatically deleted 60 days after the student receives their grade for the exam in question, unless they have been suspected of cheating.
10. If there are indications that a student may have cheated, it is treated as a suspected case of cheating. These indications may appear in the photos taken and/or sound recorded, come to light when the photos and/or sound are analyzed by the proctoring software, or relate to another occurrence during the exam.
11. If a student is suspected of cheating, GSEM informs the student and, if requested by the student, informs them of the indications of cheating and provides them with a copy of the data recorded during the exam. GSEM then reviews the data recorded during the exam with a view to keeping only the data useful for looking into the suspected case of cheating; copies of those data will be submitted to the student upon their request. The other data from the recordings are deleted, in keeping with section 9 above.
12. The data that are kept, as described in section 11 above, can only be used for the following purposes:
  - a) to investigate the suspected case of cheating
  - b) as proof, when disciplinary measures are taken against the student.
13. The following individuals/entities may view the kept data:
  - a) the Vice-dean for teaching
  - b) the appeals committee (RIO).

14. Upon GSEM's request, no more than two authorized TestWe staff members who are contractually bound by a non-disclosure agreement may be given temporary access to the personal data, for IT support purposes only.
15. The student is entitled, at all times but within the limits set out in section 9 above, to have access to their personal data, pursuant to Article 24.1 LIPAD. The access terms are set out in the e-exam directive.

### **III. Consent**

16. Details on how online and remote exams are to be run are set out in the e-exam directive.
17. In case of automatic processing (point 5a) :
  - a. Each student must give their free and informed consent before GSEM can use the e-proctoring system described in this directive. This directive must be made available to the student before their consent is obtained.
  - b. If a student does not wish to give their consent to use the e-proctoring system, GSEM will propose an in-person assessment. This does not apply to cases of *force majeure* relating to the current public-health situation (COVID-19). In such circumstances, in-person exams may be temporarily suspended and GSEM will propose a distance evaluation, with a non-biometric version of TestWe, as specified in point 5.b.

### **IV. Entry into force**

19. This directive takes effect on 1<sup>st</sup> March 2020.