UC Berkeley Privacy Office

Date: September 10, 2020

Title: Privacy Considerations for Online Proctoring – Honorlock Specific

<u>Privacy Considerations for Online Proctoring – Honorlock Specific</u>

Recommendations if Instructors Decide to Use Honorlock for Online Proctoring:

1) Provide sufficient notice that the course will include the use of Honorlock for proctoring exams:

   a) Adequate notice should be provided to students that their midterm or final exam(s) for a particular course will involve the use of online proctoring via Honorlock, ideally in the course catalog or syllabus, so that students are informed and can make decisions regarding course selection and completion or be provided with sufficient notice to request a reasonable accommodation.

   i) The notice should describe how Honorlock is used to proctor remote exams; specifically, that it monitors a student's actions using a live proctor observing the student via video, and that it monitors the student's internet browsing activity during the exam to ensure that unapproved aids, search engines or other unapproved sites are not used during the exam.

   b) Advance notice regarding the technical requirements required for students to take exams proctored using Honorlock should be provided. For example, Honorlock requires that students install the Honorlock Chrome extension into the Google Chrome browser.

   c) Students should also be advised of the specific personal data about them that will be collected by HonorLock and the Instructor; specifically data used to identify them prior to the exam and their internet browsing activity during the exam.

   i) [Honorlock's Student Privacy Statement](#) should be made available to students in advance of the exam.   It indicates that Honorlock does not collect any student personal data nor does it access other personal devices connected to the student's network.

   d) Students should be notified that proctored exam sessions will be recorded. This notice must be made well in advance of exam day.

2) Instructors should ensure that students have ample time to request accommodations for relevant disabilities.

   a) Students should be advised that only requests formally submitted to the [Disabled Students' Program (DSP)](#) will be considered.

3) Students should be permitted to petition for an alternative arrangement. Sample considerations for alternative arrangements include:

   a) Provide an opportunity to petition for an alternative exam method, such as a take home exam, a paper, or other alternative.

   b) Identify an example list of circumstances that might qualify for such an alternative (e.g. reasonable accommodation, low bandwidth situation, lack of a private room, high risk of interruption; high risk of excess body movement, sneezing from allergies, etc.)

4) Recordings of exam sessions:

   a) Honorlock records each proctored exam session and stores recordings of exam sessions in the cloud through Amazon Web Services. These recordings are available only to instructors, student conduct officials and relevant Department staff.

   b) Honorlock stores recordings for 12 months after which they are deleted. If, there is a business need for an Instructor or Department official to maintain a recording of a proctored exam session for longer than 12 months, it must be downloaded and stored on a secure UC Berkeley-approved platform before the 12 month anniversary of the exam date. It is recommended that recordings of proctored exam sessions only be kept for as long as there is a business need.

   c) Distribution and Sharing of Recordings: Because recordings of proctored exam sessions contain FERPA-protected information about the students enrolled in the course, it is important to distribute links to recordings using bCourses, or another method that restricts their visibility to only those students and staff who are associated with your course. The recordings should only be shared with enrolled students in the course and relevant staff.

5) Notice Regarding Recording and Deletion Practices: Students should be notified in advance regarding recording and deletion practices. A sample notice is included below:

   "This program records you during the exam session. Recorded sessions are stored for a minimum of 12 months and potentially longer in the event that the session is required for further review by Student Conduct. Data collecting during the exam session, including the video recording may be used at UC Berkeley solely for the purpose of verifying test environment integrity."

6) Anxiety Mitigation: In the weeks prior to a remotely proctored exam, students should be reminded of [Campus Mental Health Resources](#) that are available to them if they find themselves experiencing more than normal anxiety over the exam process.

7) Exam Rules: Pre-exam, students should be made aware of exam ground rules (e.g., no interruptions, no excessive movements or stretch breaks).

8) Post-Exam Criteria and Advice: Instructors should be clear on what recourse students have if there is a no-fault error during the timed exam (accidental disruption by a pet or a child; internet disruption, etc.). Students with a legitimate disruption should have the opportunity to explain what happened and receive a rescheduled test or an alternative exam.