



As a result of the State of Emergency established by Royal Decree 463/2020 on March 14<sup>th</sup> in response to the health crisis provoked by Covid-19 and the possible extensions that could be applied, San Pablo-CEU University has developed this **Protocol for Conducting Online Evaluation** applicable to all professors as well as students enrolled on Bachelor or Master Degree programs in our faculties and schools and available in two versions (students and professors). The Protocol was approved by the Governing Council in its session held on 22 April 2020. Both versions of the Protocol are current and applicable to online/distance student assessment.

# **PROTOCOL FOR CONDUCTING ONLINE EVALUATION WITH REMOTE SURVEILLANCE (PROCTORING) AT UNIVERSIDAD SAN PABLO-CEU STUDENT VERSION**

Approved by the Governing Board on 22 April 2020  
Amended by the Governing Board's Permanent Committee on 4 November 2020  
(updated on 1 June 2021)

## **PROTOCOL FOR CONDUCTING ON-LINE EVALUATION WITH REMOTE SURVEILLANCE TOOLS (PROCTORING) AT UNIVERSIDAD SAN PABLO-CEU**

As a result of the State of Emergency established by Royal Decree 463/2020 on March 14<sup>th</sup> in response to the health crisis provoked by Covid-19 and the possible extensions that could be applied, San Pablo-CEU University has developed this **Protocol for Conducting Online Evaluation** applicable to all students enrolled on Bachelor or Master Degree programs in our faculties and schools. **This protocol includes the following**

### **DIRECTIVES**

#### **CRITERIA APPLICABLE TO ONLINE TESTS AND EXAMS<sup>1</sup> WITH REMOTE SURVEILLANCE TOOLS (PROCTORING)**

Be reminded that in order to sit tests or exams online using remote surveillance tools (proctoring) students will need to have given their free, specific, informed and unequivocal consent. This consent will be given through the intranet when accessing the Virtual Campus.

#### **SECTION ONE: BEFORE ONLINE TESTS OR EXAMS**

1. Once consent has been given, it is highly recommended that students consult the material that the Digital Ambassadors have prepared for our university community before taking tests or exams. These materials and a calendar of scheduled sessions for resolving technical issues are at students' disposal on the intranet (<https://intranet.ceu.es/es-es/estudiante/Paginas/Continuidad-del-curso-.aspx>)
2. Wherever possible, students will do a short and non-assessed mock exam. The remote surveillance tools will be used during these mock exams so that students can familiarise themselves with their use. Their use will also enable students to detect incidents or technical issues such as camera, microphone or connection problems.
3. Students should check the technical requirements needed to install the required software:
  - PCs: Windows: (10, 8 or 7); Mac: (OS X 10.10 or higher).
  - Webcam (this can be internal or external).
  - Microphone (and speakers).
  - Download and install the Respondus Lockdown Browser program. <https://web.respondus.com/he/lockdownbrowser/>
  - Internet connection (broadband where possible).
  - Be reminded that tablets and mobile phones cannot be used to sit exams using remote surveillance tools.

NOTE: Students will be able to attend daily sessions with an IT specialist to resolve doubts and technical

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<sup>1</sup> **Tests** includes any test of knowledge or skills that involves the student being awarded a computable mark. **Exams** refers to the final exams of each subject.

issues. This support service has been set up on the intranet (online teaching) in the “Incidents and Requests” section.

4. The remote surveillance and monitoring tools will be used for tests and exams held throughout academic year 2021-2022.
5. Every effort will be made to ensure that evaluation tests and final exams are held at a reasonable time for those students currently abroad.
6. Before taking a test or exam the student should prepare the position of their computer and the space where they will be taking the exam respecting the following criteria:
  - Correct lighting on their face, a no-noise environment, internet access, a clear desk (no books, mobile phones, notes or unnecessary pieces of paper).
  - Exams should be taken in a room as close to the router as possible, without noise people or pets so that the proctoring system doesn't detect that you are receiving help.
7. Students should have their ID ready to show (Spanish ID card, Spanish Residency Card, Passport or CEU Student card).
8. Students should check the functions of the remote surveillance tools that will be used in each exam.

Three levels of remote surveillance have been established for assessment tests and exams:

- Minimum requirement: screen lock (software and / or browser lock, with exceptions enabled) and camera activation: identity will only be confirmed by showing an ID document (Spanish ID card, Spanish Residency Card, Passport or CEU Student card).
- Medium requirement: screen lock and camera activation: identity confirmation (showing an ID document, by examinee photo and by recording video of the examinee), face recognition and video of workspace.
- Maximum requirement: advanced settings (e.g. not allowing the exam to start if the examinee's face cannot be detected, notifications during the exam if the examinee's face is not being detected, etc.)

The student should check the functions and features of the remote surveillance tools before each exam by following the following steps:

- **Step 1** Conditions of use.
- **Step 2** Camera check. Record your image and voice for 5 seconds.
- **Step 3\*** Additional Instructions. Be sure to read these carefully.
- **Step 4\*** Exam guide and advice. Be sure to read these carefully.
- **Step 5** Photograph. Take a well-centred photograph of your face.
- **Step 6** ID. (Spanish ID card, Spanish Residency Card, Passport or CEU Student card).
- **Step 7** Workspace. Make a clear and precise recording of your desk (desktop and below) and a 360° recording of your room. (If you are unable to move your computer, you can use a mirror for this recording). Unless otherwise instructed by your professor, books, notes or mobile devices are not allowed.
- **Step 8** Face recognition feature

Teachers will be able to use one, several or all of the features marked with an asterisk at their discretion.

9. Students will receive detailed and clear test instructions in advance from their teachers. These instructions will also be available during each exam. Instructions will include the following information:

- The level of remote surveillance that will be applied during the exam.
- Exam length.
- Question type(s).
- Authorised and necessary exam material (e.g. calculator, paper for calculations, codes, reference material, software, etc.)
- *Student honesty clause: I will not give or receive any unauthorised help during this exam nor will I use any device or resource that has not been previously authorised. I am aware of the consequences of failing to comply with examination regulations and I understand that such incompliance will have academic consequences in accordance with university rules and regulations.*

10. Students with special academic needs should inform the teacher of each subject with due notice so that the teacher will be able to take the necessary steps in order to guarantee the student's rights. These might include the granting of additional time or the use of special access hardware.

## **SECTION TWO: DURING ONLINE TESTS AND EXAMS**

11. In order to allow for appropriate recognition and identification, students shall adhere to the following:

- ID: students will show an ID (Spanish ID, passport, student ID) to the camera
- Dress code: students will refrain from using any items of clothing that prevent recognition, (caps, sunglasses, hoodies, etc.) or where they could potentially hide notes or objects (neck scarves, baggy sweatshirts, etc.)
- Face recognition:
  - Face masks will not be allowed during the exam
  - Exams will be carried out in a sufficiently lit room, allowing examinees' faces to be clearly seen during camera checks. Students should avoid adjusting the position of their screen once the exam is in progress. Furthermore, backlighting (for example, sitting with your back to a window) should be avoided.

12. Whilst taking the exam, students shall:

- Not look away from the computer or the material their professor may have given them permission to use during the exam
- Not speak
- Prevent other people from entering their workspace and/or talking to them during exam.
- Be alone in the room. No noises or voices that may imply that another person is in the room with them should be heard.
- Not cover their face with their hands
- Remain seated and in silence for the duration of the exam, as they would were they taking an

exam on campus. Students must not stand up, move away from the camera and under no circumstance should they leave the room and/or disappear from view.

13. There are restrictions regarding the use of devices during online tests and exams:

- Use of additional electronic devices such as headphones, smart watches or phones is strictly forbidden.
- If you have an **external monitor** connected to your laptop, this should be disconnected during your exams and you should use your laptop's webcam be it integrated or external.
- Only one device may be used. The use of a second device (tablet, laptop...) is not permitted.

14. Be reminded that all students acquire a commitment to ethical standards when joining our university. This commitment requires honest behaviour and the acceptance of our academic integrity regulations. (Please see Student Regulations approved by the University Board on February 17, 1998, available on our website).

15. Students should bear in mind that remote surveillance tools will be recording for the duration of exams with the purpose of detecting dishonest behaviour during assessment.

16. Any unexpected issues during the exam and /or whilst it is being recorded should be reported immediately by the students to the professor using the means put in place for that purpose (specific room for questions on Blackboard or Teams). Additionally, students shall explain to the camera what happened so that their professor can check the recording later.

17. In the event of technical problems during the test or exam attributable to the University, the adjournment of the exam may be decided, with prior authorization from the Dean. In such cases completion will be scheduled and students will be informed of revised testing dates with due notice.

18. In the event of technical problems during the test or exam attributable to the student (network failure, device problems, etc.), the student must report the incident to their teacher correctly. The teacher may decide to repeat the exam for the said student following the report mechanisms provided by the proctoring tool for this purpose. The repetition of the exam will preferably be carried out as an oral exam on Blackboard Collaborate Ultra (with its corresponding recording unless the student waives the right to review).

### SECTION THREE: AFTER ONLINE TESTS AND EXAMS

19. Once an exam has finished, the teacher will check the exam using the remote surveillance tool in order to determine whether there is any evidence of students having committed plagiarism or fraud. The alerts generated by the proctoring system will be used for this purpose.

20. In the event of non-compliance with the instructions applied to remote proctoring (plagiarism or fraudulent behaviour) being detected, the Review Committee of the degree or Master affected will inform the student of the non-compliance issue so that the student can put forward their case if deemed appropriate. Verification of plagiarism or fraudulent behaviour will result in a Fail (0) being awarded. In such cases, the student can request a meeting with the Review Committee in order to be informed of the offence.

21. Plagiarism and fraudulent behaviour by students will be penalised and could lead to disciplinary proceedings and sanctions in accordance with article 9 and onwards in Universidad San Pablo-CEU Student Regulations (Reglamento 3/2020 de Estudiantes) approved by the University Board on 27 May 2020 and by the Foundation's Board on 12 June 2020.

22. Continuous assessment test grades will not be published until the results of the proctoring systems have been checked for fraudulent activity. Once the surveillance system results have been analysed and checked, by the Review Committee if necessary, the teacher may proceed to publish continuous assessment test grades following the schedules and guidelines of their subject/ subject area/Department/School.

In the case of final exams, once teachers have checked the proctoring systems for fraudulent activity, the Evaluation Boards will be responsible for the publication of grades. No teacher can inform students of grades in advance of their publication by the Evaluation Boards. Consequently, grades will be published after the Evaluation Board Reviews.

#### **CRITERIA APPLICABLE TO BA AND MA FINAL DISSERTATIONS**

23. Deadlines for handing in BA final dissertations will be set by the Dean or head of School. For MA final dissertations, the directors of the Master's programs set their deadlines on their academic calendars. If these calendars have been modified, students will receive detailed information about new schedules.

24. BA and MA final dissertations will be handed in through Blackboard. An area has been created within the subject for this purpose.

25. Oral presentations:

- a. Dissertation Committee Secretaries will generate sessions on Teams. The sessions will be created with the student's name and the date and time of the presentation.
- b. Once the session begins, the Dissertation Committee President will give the floor to the student so that he/she can start his/her presentation.
- c. As these sessions are public, other students might connect to them. In this case they will be given the status of participants and it will be necessary to block the camera, audio, whiteboard and chat options. Access to the session may be granted to relatives or other third parties by invitation only. These guests will have to indicate their name and surname(S) when entering the session.

26. Recommendations for a successful dissertation presentation via videoconference:

- Students will ensure they have a webcam and microphone and that both are working correctly.
- Students will rehearse at home.
  - Screen sharing
  - Image
- Students should control the loudness of their voice and posture and choose a neutral space.
- Sessions should be recorded in order to have evidence.
- Students will activate the remote surveillance system.
- Students will respect the time scheduled for their presentation.
- Students will answer a question round.

27. Guidelines for establishing levels of remote surveillance are explained in point 8 of this Protocol.

**INFORMATIVE CLAUSE ON DATA PROTECTION AND INTELLECTUAL PROPERTY**  
**(Recording Online Classes and Exams)**

As educational institutions at the service of society, Fundación Universitaria San Pablo-CEU (“FUSP-CEU”) and Fundación Privada Universidad Abat Oliba CEU (“FUAO CEU”) have adapted their teaching activity to a blended (face-to-face + online) model. This has been in response to the situation provoked by the pandemic caused by Covid-19 and in line with the indications issued by the responsible authorities.

Online teaching implies the processing of personal data, including the capture, recording and posting of voice and image of both students and teaching staff. The processing of this data is carried out with maximum guarantees in terms of data protection and information security laws.

In compliance with Regulation (UE) 2016/679 of the European Parliament and from the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) we inform you that the data obtained during online classes and exams will be processed by the San Pablo-CEU University Foundation (hereinafter FUSP-CEU) / the Private University Foundation Abat Oliba CEU (hereinafter FPUAO CEU), holders of the San Pablo CEU University / CEU Cardenal Herrera University / CEU Abat Oliba University for the purposes of correctly monitoring class attendance and participation, carrying out evaluation and being able in this way to fulfil the teaching commitment acquired with registration. We inform you that the other people attending your online classes will have the same access to your personal data as you have to theirs: image, voice and written comments.

Teaching staff must safeguard students’ personal data with the necessary confidentiality adopting security measures in order to do so. In the same way, students must also safeguard the required levels of confidentiality and respect the image and intellectual property rights of their teachers. For this reason, online classes and teaching materials written by the teacher may not be published outside of the classroom environment, although they can be saved by the student for individual and exclusive use. Students must also respect the privacy of classmates who may expose personal data while connected to an online class.

FUSP-CEU / FPUAO CEU inform you that this treatment is legitimised due to both Foundations’s legitimate interest in complying with the correct execution of the legal relationship established when a student enrolls at a centre and due to the obligation to stop face-to-face teaching imposed by the competent authorities in their exercise of the powers conferred by law (article 6.1.c GDPR). Additionally, FUSP-CEU / FPUAO CEU inform you that the personal data obtained during the teaching of online classes and exams will be conserved for as long as you maintain a legal relationship with the educational centre and during the period of time established by the applicable regulations in each case, except for those related to academic records which will be kept for an indefinite period of time, in compliance with current educational regulations. The conservation of personal data (image and recording) from online assessment tests will be kept for the time necessary to defend the rights of students, so that they can fully access their right to examination review and, where appropriate, challenge grades awarded.

When the support services for the online platform are provided by third parties, these will have the status of data processor, meaning that FUSP-CEU will ensure compliance with its legal obligations.



Furthermore, we inform you that you can contact the FUSP-CEU and FUAO CEU Data Protection Delegate in writing. Postal requests should be sent to C/Tutor nº35, 28008 Madrid and emails should be sent to [dpd@ceu.es](mailto:dpd@ceu.es). In compliance with the rights conferred to you by current legislation regarding data protection you can contact the competent Regulatory Authority to present any claims you deem necessary. You may also exercise your rights to access, rectification, processing restriction, erasure, data portability, objection and consent withdrawal by sending your request to the FUSP CEU General Secretary by post or by email [secretariageneral@ceu.es](mailto:secretariageneral@ceu.es).

In addition, we inform you that all classes and other Blackboard material are protected by Law 2/2019, passed on March 1, in which *the text on intellectual property is modified* meaning that any reproduction, transformation or publishing of materials requires the express consent of FUSP-CEU/FUAO CEU.