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The purpose of this document is to review the proposed arrangements for end of semester exams and understand how they would impact student welfare and the academic experience of the wider student body. ANUSA requested the opportunity for feedback on any implementation of an exam invigilation tool such as Proctorio, and has since been able to compile a list of considerations and recommendations that we believe important to be taken into account. Furthermore, this document is also informed by the public response to the publishing of Woroni's article on the matter. This response is examined through individual concerns, but also by the communication ANUSA representatives have personally received.

Overview of Recommendations

1. Exams are shifted to a take home, open book format wherever possible. Efforts are made to consult students who are unable to complete exams in any form, and additional care and consideration is given to support these students.

 For examinations where 1 absolutely cannot apply, the following is implemented:

2. Modelling is provided for the incorporation of special considerations and reasonable adjustments for all online exams to suit the needs of students with EAPs.

3. Proctorio is given a thorough privacy impact assessment by all colleges, with the consistent inclusion of student representatives in this process. Independent peer reviews of the tool should also be examined. Institution wide standards for acceptable use of the tool (if any) should be established, and both of these communicated promptly to the wider student body.

Access & Equity of Online Examination

This is clearly an unprecedented situation that has posed incredible challenges for all of us, and it is fair to recognise that there are logistical and financial limitations to what we can do with the resources we have - however, innovation remains a necessity. **It is our recommendation that wherever possible, all examinations are adapted to be suitable for a take home, open book exam format.**

This may be easier for some colleges than others due to the nature of the assessment, but should automatically address almost all access and equity concerns if implemented. Student consensus is key for this element - our understanding and estimate is that a disproportionate number of students, in the thousands, would be adversely affected if the majority of courses have timed, closed book exams that must be administered through an online invigilation tool. The following are key groups we've identified:

A. Students with unreliable or limited access to wifi & equipment
B. Students requiring special considerations, reasonable adjustments and assistive technology
C. Students with other mitigating circumstances (e.g. non private home environments, unsafe home environments)
D. Students who are intended to graduate Semester 1, 2020
E. Students who possess privacy concerns

It is not viewed or understood as an equitable outcome for students in groups A, B, C and D to have no other choice but to defer their assessment due to lack of access to an appropriate environment, accessibility requirements or infrastructure. Students in group E were not subject to these expectations when they first commenced these courses - as such, it is difficult to view this situation as active or genuine consent. Moreover, graduating students (group d) upon whom the impact will be even higher, often belong to multiple of these groups.

Ultimately, we believe that it is evident that proceeding with current arrangements will come at a reputational risk and damage to the ANU (reflected in public response to the news) and ask that they be reconsidered for this more equitable option.

Proctorio

There are numerous concerns that have been raised with the use of online exam invigilation tools, some of which are detailed below. If the situation exists (due to TEQSA or other external stakeholder requirements) that some courses have a compulsory invigilated component, it is our contention that it is only possible to address them by undertaking a privacy impact assessment, in line with ANU policy, as well as by examining independent peer reviews of Proctorio for justification.

ANU Proctorio Privacy Impact Assessment

We would like to firstly seek clarification regarding whether a Privacy Impact Assessment has already been planned before rollout of this tool, and whether colleges will be required to conduct one, and finally, that students are involved in the examination of the operational side of this process as key stakeholders. It is our understanding that by ANU Policy,

A PIA is likely to be required if:

- personal information is collected in a new way;
- personal information is collected in a way that might be perceived as being intrusive;
- personal information will be disclosed to another agency, a contractor, the private sector or to the public; or
- there is a change in the way personal information is collected, disclosed, retained, stored or secured or "handled"."

Most of these do apply to Proctorio, so this recommendation should be in line with ANU's Policy on the matter. Furthermore, it is significant to note that one of the key concepts in the Information Commissioner's guidelines is to 'minimise' privacy intrusions. It would be helpful if key stakeholders are identified in relation to this during this meeting so that operational work and discussions on this may begin.

ANU Privacy Policy Webpage: https://www.anu.edu.au/privacy

ANU Guidelines on PIAs: https://policies.anu.edu.au/ppl/document/ANUP_01940

Federal APP Guidelines: please click here

Encoded algorithim discrimination:

Groups that would be adversely affected by widespread online and closed book examination models were outlined under the access and equity section. In the case of the use of an exam invigilation tool, modelling is even more necessary for the incorporation of special considerations and reasonable adjustments for all online exams to suit the needs of students with EAPs and general accessibility requirements.

It is evident that an online invigilation tool only exacerbates these issues - furthermore, questions are raised whether claims of neutrality may in fact encode algorithmic discrimination. Some of these issues are explored in the article below. Ultimately, independent peer reviews that establish the efficacy of these online invigilation tools - whether they do preserve academic integrity, whether they do address privacy concerns and whether they are genuinely suitable or appropriate for our purposes are necessary.

https://hybridpedagogy.org/our-bodies-encoded-algorithmic-test-proctoring-in-higher-education/