

## Online Assessments Privacy Notice

### 1. Introduction

Online Assessments are run by the University of London. We are registered as a data controller with the Information Commissioner's Office [notification number is Z5419651] and have a Data Protection Officer, Suzie Mereweather who can be contacted via [data.protection@London.ac.uk](mailto:data.protection@London.ac.uk). You can find out more on our data protection webpage at <http://www.london.ac.uk/data-protection.html>

One of our responsibilities is to tell you about the different ways we collect and use your personal data. This statement provides details about these uses in relation to online assessments run in the 2025 exam period(s).

This Privacy Notice gives you the information available about online assessments at this time. This Notice will be updated with additional information when the process changes.

### 2. What information do we collect from you?

The online assessments process requires us to capture certain information about those students of University of London Worldwide who are sitting exams in the 2025 exam season. We are aware that recording home environments has an impact on the privacy of exam candidates and limit the personal data we collect to ensure we only collect necessary personal data. The data we collect will depend on which method of online assessment is used for your exam.

All online assessments will collect the following types of personal data:

- Names and Student Numbers
- Email address
- Proof of identity
- Programme of study, location, cohort, study mode
- Marking and annotations of submissions (where made)
- Feedback to test taker

Exam candidates sitting exams using Online at Home or Online at Exam Centre will also have the following personal data captured:

- Images and recordings on screens on which exams are being taken
- Event log

Exam candidates sitting exams using Online at Home or Online with Live Proctoring will also have the following personal data captured:

- Audio from the device microphone. This will capture conversations taking place in the vicinity of the device including with online proctors.
- Images/recordings of individuals and their home or personal environment
- IP address of candidate

Through the online assessment process, the University may capture some personal data that is more sensitive (called "special category" data in UK data protection law). This data may be

captured where images/recordings show a visible disability or where items are captured in images/recordings which indicate religious, philosophical or other beliefs. The University is not actively capturing this data or using it in any purposeful way. We do not consider that the University is using the special category data to uniquely identify any individuals.

The special category data we do capture is:

- Biometric data where facial recognition software matches a student's face to photographic ID that shown to webcam
- Health and wellbeing data where images/recordings captured during online assessments show a student in visible distress while sitting the assessment

### **3. Why do we collect this information?**

We collect and use the personal data described above to maintain the integrity of University of London degrees by:

- Ensuring assessment conditions are enforced consistently across online assessments
- Ensuring concerns around academic misconduct can be effectively reviewed and appropriate action taken
- Reducing instances of academic misconduct
- Ensuring that individuals taking assessments are the registered candidate by reviewing the identification of the individual taking the assessment.

Personal data captured during online assessments is processed for the performance of a task which is part of the University's obligation as a public authority. This public task is ensuring effective examination procedures as part of our teaching and learning provision as defined in our [statutes and ordinances](#). The [integrity and quality](#) of the degree programs offered by the University of London forms an important part of our public task.

Special category data captured for facial recognition is processed in the substantial public interest where it relates to preventing unlawful acts and dishonesty (Data Protection Act 2018, Schedule1, part 2, paragraph 12). The University considers academic misconduct to be a form of dishonesty and seriously improper conduct which can impact the integrity of a degree. Good academic conduct is a requirement forming part of generally accepted principles of good practice related to gaining a degree.

### **4. What do we do with this information?**

Personal data is captured and stored via the third party services supporting our online assessment processes. You can find out more information about these third party services on our Online Assessments page: [Online assessments - Student - University of London](#). Data captured on third party software platforms will be accessed by University of London staff and may be transferred to University systems to facilitate delivery of assessments and associated procedures. Recordings are reviewed by algorithms within the third party software and this data may be used as part of an academic misconduct investigation . These include activities such as a student leaving the room, a student moving out of camera shot or a third party entering the shot. Potential instances of academic misconduct are reviewed by University of London staff before being acted upon.

The University of London has carried out all appropriate checks to make sure that third parties capture, store and process personal data in line with the requirements of data protection law.

Special category data relating to physical or mental health or wellbeing may be shared with our Wellbeing team if the online assessment process captures images/recordings of visible distress of exam candidates. We will usually ask for your consent for us to pass this data to our Wellbeing team, but in situations where we are unable to capture your consent we will share relevant data with the Wellbeing team in the substantial public interest in relation to safeguarding children and individuals at risk (Data Protection Act 2018, Schedule 1, part 2, paragraph 18).

## **5. How long do we keep your information?**

We keep your personal data in accordance with the University's retention schedules and so data collected and used within online exams will be kept for the same length of time as other exam scripts (5 years after the end of your relationship with us) before being destroyed.

Images/recordings captured as part of online assessments will be kept for one year after the exam period and will then be destroyed. If an academic appeal is made or the information is required for longer to assess potential instances of academic misconduct. The data will then be used within the academic misconduct process and kept for 7 years before being destroyed.

Data is retained on third party systems for 180 days before being automatically deleted from that system.

## **6. Who do we share your information with?**

Personal data captured during the online assessments processes is collected and used by teams within the University to mark exams and review instances of potential academic misconduct. Examiners based in Federation Member Institutions of the University of London will have access to online assessment data depending on the level of oversight within your programme of study.

Recordings of academic misconduct may be shared with other relevant teams within the University in order to process student facing regulations, such as:

- Regulations for academic appeals
- Student disciplinary regulations

Images/recordings containing information showing the visible distress of exam candidates or where we otherwise have concerns about the wellbeing of the exam candidate during an assessment may be shared with our Wellbeing Team (see Section 4 of this privacy notice for more information).

Data may be shared with countries outside the UK where it is needed for our third party suppliers to provide their services to us. Wherever personal data is shared outside the UK it is done in accordance with the expectations of UK data protection law. This often includes protecting the data with appropriate contractual clauses or other appropriate safeguards set out by the UK Regulator for data protection, the Information Commissioner. We will always ensure that any data shared with third parties has an appropriate data processor agreement in place to protect your personal data.

## **7. What rights do you have in relation to the way we process your data?**

You have certain rights as someone whose personal data we process. You can find detailed information about [your rights as a data subject](#).

You have the right to:

- Ask us to confirm that your personal data is being processed and to gain access (i.e. have a copy) of that data and to be provided with supplemental information about the processing.
- Request that we rectify any inaccuracies where the data we hold on you is inaccurate or incomplete.
- Have your data erased by us, although in certain circumstances we may not be able to do this. The circumstances where this applies can be found in the [guide to data subject rights information](#).
- Restrict the processing of your personal data in certain ways.
- Obtain your personal data for reuse.
- Object to certain processing of your personal data.

If you would like to exercise any of your rights please look at the information available on the [data subject rights webpage](#).

### **Make a complaint**

If you have any concerns about the way that we have handled your personal data please [email the Data Protection team](#) as we would like to have the opportunity to resolve your concerns.

If you're still unhappy, you have the right to [complain to the Information Commissioner's Office](#) (the UK Regulator for data protection matters) about the ways in which we process your personal data.