

**Reply by the European Personnel Selection Office to a request for information
from the European Ombudsman**

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**Own-initiative inquiry concerning open competition
EPSO/AST/154/212- ref. OI/1/2023/VS**

The inquiry

By letter dated 15 March 2023¹, the European Ombudsman informed EPSO that she had decided to open an own-initiative inquiry concerning the use of remote testing only for the 'pre-selection' tests in open competition EPSO/AST/154/22².

In this context, she asked EPSO to reply to a series of 11 questions.

EPSO's comments

In reply to the inquiry, EPSO would like to provide the Ombudsman with the following clarifications and comments concerning the issues raised therein.

Context

EPSO published a 6-field open competition EPSO/AST/154/22 on 22 September 2022. 6300 applications were received by the deadline – 25 October 2022. The testing window was 22 November – 2 December 2022 with a contingency date on 8 December 2022 to test candidates who for justified reasons were not able to sit the test. 5693 candidates booked the online reasoning tests. 4633 candidates actually took the test (81% of bookings, 74% of applications). This was the first EPSO competition of such large scale with computer-based testing, entailing multiple-choice questions (MCQ), done exclusively online.

EPSO's Candidates Contact Service (CCS) received 967 questions and complaints concerning the testing session via the website contact form. The deadline for complaints was 5 December 2022 (3 days after the last test day). CCS managed to process all questions and complaints. The questions concerned bookings, requests for reschedulings in the run-up to the event, troubleshooting for the mock exam, the principle of remote testing, etc.

EPSO investigated all complaints about legitimate issues – it did not investigate complaints that fell outside the framework of the Notice of Competition, did not comply with EPSO's instructions or were focused on the principle of remote testing. A total of 197 candidates logged complaints on legitimate technical or organisational issues (4,2% of tested candidates). A failure rate of up to 5% (on the first attempt) is considered acceptable in the testing industry. As a percentage of the total candidate population, we did not experience an abnormal proportion of issues in this testing.

As for any open competition, EPSO applied the principle of equal treatment – all candidates, whether staff members of the EU institutions or not, were considered EU citizens who were

¹ Ref. Ares(2023)2579483

² Assistants (AST3) in the fields of finance, accounting and communication.

offered the same conditions. The Selection Board has been kept informed about the criteria applied in the investigation and its results.

A new opportunity to retest online was offered to 107 candidates (54% of legitimate complaints) where it could be verified that they were unable to complete the test for reasons outside their control (inability to launch the test, faulty actions by the contractor, disconnections, excessive waiting times, etc). 90 candidates who complained were not offered a retest (1,9% of tested candidates). Rejected claims were either unsubstantiated or due to the candidate not following instructions.

Tests taking place only remotely

- 1) *The vacancy notice for competition EPSO/AST/154/22 states that the format and practical arrangements ('delivery mode') for the pre-selection and other tests will be specified in the invitation letters to the tests. At what stage did EPSO decide to organise the pre-selection tests exclusively remotely for this competition? What are the reasons behind the decision?*

The transition to online testing is a strategic choice endorsed by EPSO's interinstitutional Management Board, its highest governing body. Remote testing is the delivery mode of the future and responds to the evolution in the market of large-scale staff selections. It is flexible and accessible from wherever the candidate is and entails no travelling costs (and is, therefore, greener). Online selection is also more modern and in line with digitalisation of the institutions. One of the objectives of the new model is greater diversity of the applicants in the wide sense of the term: profile, background, origin. The transition to remote helps the EU institutions to attract talent outside the 'Brussels bubble'.

The concept of universal remote testing in all phases was presented as Annex 5b. at the Management Board meeting of 18 October 2022 (attached as Annex I to these comments). On page 3, the Minutes of the meeting (in Annex II to these comments) state that the Board members 'Did not oppose EPSO proposal on the way forward with the competition models (generalist + specialist).' Further down on page 3, the Minutes refer to a follow-up action: 'EPSO to continue working on improving remote testing, including its security aspects.'

- 2) *When deciding to carry out the tests for this competition exclusively remotely did EPSO carry out a prior assessment? If so, did this assessment take into account the need to ensure equality of access and treatment for candidates, also taking into account the socio-economic situation, including access to a private computer?*

Before introducing exclusive, compulsory remote testing for competition EPSO/AST/154/22, EPSO's Testing Operations Unit assessed operational risks (such as connectivity issues, technical problems, etc.) involved with online testing. This assessment was based on 1) experience with voluntary online testing which had been available to candidates since 2021 and 2) experience with smaller-scale competitions (i.e. competitions involving fewer candidates) for which tests had been delivered exclusively remotely in the second half of 2022. EPSO did not assess other types of risks. Regarding the evaluation of factors related to 'equality of access and treatment for candidates, also taking into account the socio-economic situation', please see the reply to question 4) below.

- 3) *The invitation letters set out detailed requirements and instructions for candidates invited to sit the pre-selection tests, in particular the requirement that the tests are taken on a private computer, with detailed technical specifications, for which the candidates have administrator rights. Candidates without access to such a computer were, in practice, excluded from sitting the tests or forced to incur significant financial costs. When such candidates contacted EPSO, it did not propose solutions, other than 'to find a computer'. Could EPSO elaborate on its response to these access problems? Could EPSO also elaborate on how it considers this requirement, and the provision of a charged phone line for technical support, to be consistent with the principle that EPSO exams be free of charge?*

Owning a computer is not obligatory to sit EPSO's tests – candidates can borrow one or arrange for access to a computer and appropriate internet connection on the premises of a third party, if one is not available in their location. Online selection tests may be run on a corporate computer but multiple security controls would have to be disabled or changed by an authorised administrator.³

Thus, the requirement to be able to exert administrator rights on the computer to be used for the test does not imply a requirement of ownership; it is there to allow troubleshooting on machines whose security features would otherwise impede the test. These security features are typically found on corporate machines. It is to be noted that security features can be lifted by the respective IT services. By way of example, the European Parliament, the Council and the Commission have 'whitelisted' the application of a test platform provider (TestWe) to allow their internal candidates to test with corporate computers. The TestWe application is similar to the Prometric application used for EPSO exams: it takes full control of the computer used by the candidate. As regards the replies provided by CCS, their exact content was the following:

Dear candidate,

I confirm that the computer-based Multiple-Choice Question (MCQ) tests for competition ... are organised exclusively remotely via our contractor Prometric's ProProctor application.

In case you do not have a computer, I may only suggest you to try to borrow some one else's private computer for the test and to run the mandatory enhanced readiness check and the mock exam for a complete end-to-end readiness check to ensure the computer is ready to support the test day experience. The information and instructions related to remotely proctored testing are available in your invitation letter....

If you require technical support before your exam, including during the launch of the system readiness check and mock exam, please click on this link: <https://ehelp.prometric.com/proproctor>.

For more information on the remotely proctored testing please refer to our Frequently asked questions and in particular the following:

- How are remotely proctored computer-based tests organised?*
- Why did EPSO introduce remotely proctored computer-based tests?*

Regarding technical support: candidates were instructed by EPSO to troubleshoot exclusively via the Live Proctor feature available in the exam itself, or Prometric's technical support, via the [chat link](#) in the exam and the instructions (the full set of instructions provided to candidates for remote computer-based tests is attached in Annex III). This would not entail

³ EPSO has published a Note on this subject: <https://epso.europa.eu/en/corporate-computers-and-online-tests>

any costs to the candidates, as Prometric technicians would contact candidates in reply to these troubleshooting requests.

Unfortunately, EPSO is aware of individual cases wherein Prometric's proctors erroneously gave a US or international number to candidates for troubleshooting purposes. This was done in violation of specific instructions by EPSO not to direct candidates to paying phone lines. At the time of writing, this issue has been solved and the charged phone lines have been disabled.

EPSO is revising the instructions to candidates that will be provided for future competitions with a view to making them shorter and more user friendly.

- 4) *The invitation letters also set out the requirement that candidates have an internet connection speed of at least 1.0 Mbps. Given that not all households in the EU have internet access and not all of those have a reliable connection of at least 1.0 Mbps, and given that the invitation letters also set out the requirement for candidates to be in a private room with no third party entering the room, did EPSO reflect on the fact that these requirements may result in unequal access? If so, did EPSO reflect on how to take this into account?*

EPSO's Testing Operations Unit did weigh the pros and cons of compulsory online testing against the pros and cons of having candidates physically travel to a test centre, which for many would be far away from their place of residence while being conveniently close for others⁴. Candidates residing in or close to Brussels where the bulk of test centre capacity was located were privileged compared to others who had to travel and in some cases find accommodation for the night. The conclusion was that on balance, online testing would provide better access for many candidates while it would not inconvenience more candidates than were inconvenienced by the requirement to travel to a distant test centre.

As for the requirement to be alone in a closed space for the duration of the exam, it does not imply that the space be private or located in a private residence. The connectivity requirement of 1 Mbps is on the low side (a bandwidth of 10 Mbps would be considered as standard) and is not higher than what a teleworker would require to be able to participate in conference calls or online meetings.

How the tests were carried out in practice and how support was provided when problems occurred

- 5) *Did EPSO allow any of the candidates to sit the test at a test centre? If yes, please provide us with additional details that would enable us to understand the situation and EPSO's decisions.*

All tests took place remotely with the exception of two cases. Specifically, two candidates located in China sat the test in Prometric's Beijing Test Centre, because the Prometric remote platform was at that point blocked from use in China.

⁴ For example, there were only three test centre locations for the whole of Germany.

- 6) *How many technical support staff were available online during each timeslot for candidates facing technical difficulties? When a technical problem occurred on the testing day, who were candidates expected to contact and by when?*

As stated above, candidates were instructed to troubleshoot immediately as they encountered an issue during the exam, exclusively via the Live Proctor feature available in the exam itself, or Prometric's technical support, via the [chat link](#) in the exam and the instructions.

Regarding the availability of support staff, please find this information in the document in Annex IV.

- 7) *Did EPSO adopt specific rules on the rescheduling of tests for these remotely operated tests? If so, could EPSO please share these? If not, could EPSO please share the rules that applied?*

All complaints that were *prima facie* receivable (i.e. submitted within the deadline and according to the procedures set out in the Notice of Competition and the instructions to candidates) were investigated by the Computer-Based Testing (CBT) Team within EPSO's Testing Operations Unit. The documentary proof examined in the context of these investigations included the following: log files, xml files, chat transcripts with Prometric staff, HelpDesk tickets, DVR footage.

Based on the outcome of these investigations, EPSO offered a retesting opportunity in the following cases:

- when technical issues were outside of candidates' control and occurred despite their due diligence; and/or
- when candidates had gone through the mandatory enhanced system readiness check and mock exam, if the issue concerned the launching of the test; and/or
- when candidates tried to troubleshoot with Prometric during the exam itself and provided proof of these troubleshooting attempts (e.g. a HelpDesk ticket, which allowed EPSO to investigate).

Where the investigation was not conclusive, the benefit of the doubt was always given to the candidates, who were consequently allowed to retest.

If candidates experienced technical issues concerning launching the test but had not undergone the mandatory checks beforehand, they were not offered a retesting opportunity. Candidates who did not troubleshoot during the exam, or who complained outside the deadline, were also refused. In cases where candidates failed to complete the test because they didn't follow the instructions (and e.g. their exam was terminated by the proctors for this reason), their complaints were also rejected.

- 8) *Candidates were required to undergo a 360 degree inspection of the room where they intended to take the test, including the contents of furniture in the room. In this context, how does EPSO and Prometric ensure the protection of privacy of candidates?*

Candidates were not required to open closed furniture, however a check of the content of open

shelves was required to make sure no recording devices were present. These checks are standard in the online testing industry and are necessary to protect test content and deter fraud or cheating.

A detailed explanation of the security protocol to be followed was shared with the candidates in advance of the test, allowing them to prepare the room and remove any private objects or materials they would not want to be checked or recorded.

Access to the video footage recorded during the exam session is limited in time - recordings are erased after 30 days - and shared exclusively with EPSO on a need to know basis when a candidate lodges a complaint (recordings allow for example to verify candidate claims about wrongful terminations of their exam by the proctor).

9) *Did EPSO have in place rules or give instructions to candidates covering different scenarios when technical or other problems occur (for example, if there is a problem with a candidate's internet connection right before or during the test).*

The instructions provided to candidates gave detailed information on when and how to troubleshoot any technical issues. Candidates were provided the opportunity to run an enhanced system check and mock exam in the run-up to the exam, to check equipment and system requirements (including internet stability and speed) and to ensure that they are met on the day of the exam.

10) *Did candidates report issues with accessing and receiving help through the chat function? How did EPSO deal with those complaints?*

EPSO did receive complaints from candidates who claimed that they had not managed to contact the Prometric HelpDesk via the chat function available in the exam.

It is pertinent to mention here that the instructions provided to candidates before the tests contained the following warning: *'Please be aware that you will first be directed to an automated response bot and only after you answer the first questions will you be connected to a live support agent'*. This extract of the instructions was recalled in the initial replies provided by CCS to those candidates who claimed issues with the chat function.

It appeared that some candidates didn't realise that they were first directed to a chat bot and that they had to reply to the chat bot before they could be connected to a live support agent if still necessary. Others did not wait before they were connected to a live support agent. In the remaining cases, where the candidates claimed that they followed the instructions but still couldn't get connected with an agent, the complaints were investigated by the CBT team.

11) *Did any of the candidates report being refused a ticket number? How did EPSO treat those complaints?*

Candidates are provided a ticket number as soon as they seek help, even before the issue is troubleshooted, as long as the troubleshooting attempt is made on the day of the exam and in line with the Notice of Competition and the instructions to candidates.

EPSO recorded one case where the candidate claimed that the agent had refused to issue her a ticket number. This case was investigated, however since the investigation concluded that the candidate had successfully completed the computer-based tests and her results would have allowed her to progress to the next competition stage⁵, the matter was not pursued further.

In all other cases - the vast majority – it appeared that the problem was that the candidate did not manage to get a ticket because contrary to the instructions received they did not use the right troubleshooting channel.

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EPSO trusts that it has provided the Ombudsman with all the relevant information concerning this inquiry and remains at her entire disposal for any further clarifications.

I would like to reassure you of EPSO's commitment to continue its drive to modernise the EU selection process making it shorter, more agile and fit-for-purpose.

Annexes:

- I. Annex 5b. discussed at the Management Board meeting of 18 October 2022
- II. Minutes of the Management Board meeting of 18 October 2022
- III. Instructions to candidates on computer-based remote testing:
 - (a) Invitation to the computer-based Multiple-Choice Question (MCQ) tests
 - (b) Instructions for remotely proctored MCQ tests
 - (c) Prometric ProProctor User Guide
 - (d) FAQ ProScheduler Booking
- IV. Availability of technical support – ‘ProProctor Agents per hour - Nov 22 - Dec 2. xls’

⁵ Had the competition not been cancelled.