

# ADMINISTRATIVE PROCEDURES

<b>SUBJECT:      Use of (Third Party) Online Educational Tools</b>
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There are many types of online tools and applications that educators might use to support learning in the classroom. These tools might be used for a variety of purposes such as assessment or for subject-specific instruction and collaboration. The use of these tools must be carefully considered by each educator prior to implementation in order to protect students' personal information.

The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) sets out the legislation that school boards must adhere to for the collection, use, disclosure and retention of personal information. The definition of personal information is very broad and includes any information on its own, or as an aggregate, that can identify an individual and/or contains information about them. Personally identifiable information includes but may not be limited to a student's first and last name, photo, date of birth, address, phone number, email address, student identification number, school name and grade, assessment notes and personal health information.

## **Educator Responsibilities**

All LKDSB employees must ensure that personal information is adequately protected at all times. The collection of personal information should be limited, collected for a specific purpose, and retained for only as long as it is needed.

The use of online tools should therefore be considered carefully to ensure that student personal information is protected as legislated under MFIPAA. Three tools are provided centrally by the LKDSB that provide adequate protection of personal information, and these are: Google Apps for Education (GAPE), Microsoft Office 365 (O365) and Desire to Learn (D2L).

Any other online educational tool should be thoroughly assessed prior to use, as many do not guarantee the protection of personal information and do not meet MFIPPA standards.

### Guidelines for the Use of Online Tools

- If the tool is being used for assessment, do not use the students' first and last names (OEN or student number). Use an initial or other code instead. Basically speaking, anonymize the information.
- Always ensure strong passwords are used on any tool that stores personally identifiable information, and that these passwords are changed regularly.
- Check the End User Licence Agreement (EULA) and Privacy Policies of the tool. Is there sufficient protection of privacy of the data or does the tool vendor own the data and is able to sell it on to advertisers? Do these policies prescribe a certain age range for use of the tool?
- A good guideline is whether the tool conforms to COPPA (Children's Online Privacy Protection Act). This is U.S. legislation and there is no direct comparator in Canada.
- Educators should consider notifying parents/guardians of the students whose data will be stored in the application, explaining what they are using, why they are using it, what information will be stored in the application. **Positive written consent from the parents/guardians is recommended prior to using the application.**
- Parental/guardian permission should always be obtained if photos are being stored, or non-anonymized personal information is stored in the tool.
- Caution needs to be taken regarding access to information. In general access to a student's information should only be provided to their parents/guardians. Educators should be especially cautious about sharing photos, either with parents/guardians or publicly.
- 'Closed' groups on social media sites should be considered as public sites, as once the information is posted it can be copied and re-posted, and many sites own the information once uploaded to use/sell as they wish.
- Ensure that all information is only kept for as long as is needed. Delete information and accounts as soon as practical, and definitely within one year of the information no longer being needed.
- If in doubt contact the Board's FOI Co-ordinator or IT Manager via your Principal prior to using the online tool.
- Teachers should consult with their principal prior to using any online educational tool where any student data (especially including photos, and even if the data is anonymized) is uploaded to the tool.

### Digital Tool Consent Letters

When sending letters home to parents/guardians to seek their consent to use online educational tools, educators need to consider the following elements:

- Tell the parents/guardians the tool you are planning to use.
- Tell them why you are planning to use it.
  - What advantages will use of the tool bring to their child's learning?
- Tell them what information will be uploaded and kept in the tool.
- Copy and paste the link to the tool online Privacy Statement.
- Explain in clear terms to the parents/guardians any commitments that the vendor makes in their Privacy statement (e.g. <vendor A> commits to never sharing or selling your child's information).
- **Obtain permission to use the tool before you start using it.**

- Provide your contact details and offer to discuss use of the tool should the parent/guardian have any questions or concerns.

**Consent Letter Template (Appendix A)**

It is very difficult to produce a standardized template letter as there are thousands of apps and tools, that can be used very differently and for different purposes.

Appendix A - Sample letter to parents/guardians for use of the online tool Seesaw.

Consent should be obtained annually at the elementary level and for each semester at the secondary level; or as needed when new online educational tools are being utilized in the classroom. Parent/guardian permission forms should be retained for a minimum of one year.

**Use of Online Education Tool Flyer (Appendix B)**

Appendix B is a checklist for educators using online educational tools to ensure the protection of student personal information.

Implementation Date: November 6, 2017

Reference: Responsible Use of Technology Procedures

**Appendix A**

Dear Parents/Guardians,

This school year, our class will be using Seesaw to collect and share work in our classroom. Your child will be able to upload things they are working on, including photos, videos, writing, and voice recordings, to their Seesaw journal. This gives you the opportunity to keep up with what is happening in the classroom, as well as our class community a place to share our work with each other. This tool is also a great way for students to quickly share their digital work with me.

In order for your child to use Seesaw, certain information like their first name, photo, video, or voice, may be uploaded to Seesaw. Seesaw’s privacy policy commits to never sharing or selling your child’s information. You can view Seesaw’s privacy policy here (<https://app.seesaw.me/about/privacy>).

Please sign below and return this permission slip so that your child can use Seesaw

If you have any questions about our use of digital tools in the classroom, I would be more than happy to speak with you. You can reach me at (insert phone number).

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**Please sign below and return the form to school.**

I give consent for my child, listed below, to use Seesaw for class activities.

Student Name: \_\_\_\_\_

Parent Printed Name: \_\_\_\_\_

Parent Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix B

## Take these steps to help keep student information safe

**EDUCATORS ARE RESPONSIBLE FOR PROTECTING STUDENT PRIVACY**

**TIP:**

*If a tool complies with **COPPA** that's a good indicator that it strives to keep student information safe*

**DO NOT:**

- Use personal information like student last names, OEN, or student numbers

**DO:**

- Use a strong password on your account
- Check the age limit for the tool
- Check the privacy policies for the tool
- Consult your administrator before using the tool
- Receive written permission from parents before using the tool
- Ensure that parents only have access to their own child's information (and not that of other students in the class)
- Remember that anything you share can be made public by those you share it with
- Delete the information from the app when students move to a new classroom



**Lambton Kent**  
District School Board