



## **Digital Learning Tools and Student Data Privacy**

**To:** Committee of the Whole

**Date:** November 13, 2019

**Report No.:** 11-19-3779

### **Strategic Directions**

- Transform Student Learning
- Create a Culture for Student and Staff Well-Being
- Provide Equity of Access to Learning Opportunities for All Students
- Allocate Human and Financial Resources Strategically to Support Student Needs
- Build Strong Relationships and Partnerships Within School Communities to Support Student Learning and Well-Being

### **Recommendation**

It is recommended that the report on Digital Learning Tools and Student Data Privacy be received.

### **Context**

As the use of online learning and digital resources in the TDSB have increased so has the district's emphasis on ensuring technology enabled learning is done safely and securely. In recent years, a particular emphasis has been placed on protecting student data when teaching and learning has leveraged digital tools and resources.

This report outlines the laws that govern TDSB's use of student information, our practices of keeping student data safe in an online environment and our future plans in these areas.

The quantity and type of educational technologies available to schools, teachers and students has increased substantially over the last decade. This increase has brought a plethora of choice to classrooms for activities such as sharing assignments and resources through an online classroom, documenting student learning and communicating with parents to name just a few. These choices have enabled teachers

and students to teach and learn in ways that were not previously possible. However the quantity of tools, apps and platforms available bring new and increased privacy and security concerns.

To provide a safe online learning environment and protect student data the TDSB has undertaken a number of actions.

The TDSB's collection and use of student information is governed by The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and The Education Act, R.S.O. 1990, c.E.2. The TDSB has a Privacy Office that ensures the organization's compliance with the *Municipal Freedom of Information and Protection of Privacy Act*. The Privacy Office also created and implemented a Freedom of Information and Protection of Privacy Policy, and has assisted with material to train and communicate to employees and stakeholders about TDSB's organizational policies regarding safeguarding and protecting personal information.

MFIPPA requires an organization to provide notice when previously collected information is used for a particular purpose. This impacts digital learning tools mostly in the area of account creation. Some digital learning tools and resources the district provides to students and staff require an account to access the tool or platform. For example, in G Suite for Education TDSB uses the student's first name, last name and account ID ([firstname.lastname@student.tdsb.on.ca](mailto:firstname.lastname@student.tdsb.on.ca)) are used to create the account. In the Brightspace learning platform (provided by the Ministry of Education to all school boards in Ontario) the student's first name, last name and TDSB student number are used to create the account. In order to comply with MFIPPA requirements TDSB has posted this notice on our public website: <https://www.tdsb.on.ca/Elementary-School/The-Classroom/Technology>.

### **Cyber Risk Assessment**

The TDSB completes a cyber risk assessment on any new digital tool or technology. The Cyber Risk Assessment (CRA) is completed by the vendor of a new, proposed technology for TDSB. It is comprised of sixty-four questions the vendor must answer and has three main purposes:

1. Identification of cyber risk issues;
2. Feedback and awareness provided to identify the risk issues, along with recommendations for mitigation;

The TDSB is also going back and performing cyber risk assessments on companies and technologies that have been in use in the district that have not had a cyber risk or privacy assessment completed, such as My Blueprint (platform used for secondary school course selection and other guidance related activities).

## **Privacy Impact Assessment**

The Privacy Office conducts Privacy Impact Assessments (PIA) to ensure compliance with the *Municipal Freedom of Information and Protection of Privacy Act*. The PIA is a tool that the Privacy Office uses to identify the privacy risks involved in a new, proposed or existing program, technology or activity that involves the collection, use and disclosure of personal information. There are two privacy impacts that the privacy office uses to evaluate the level of risk involved in a new program or software, whether or not there is a significant risk to individuals such as identity theft or risk to institutions including, but not limited to, the impact of privacy breaches and the failure to comply with the *Municipal Freedom of Information and Protection of Privacy Act*.

## **District Supported Digital Learning Tools**

The TDSB has taken considerable, consistent efforts in establishing a series of district provided and supported digital learning tools and communicating the importance of using these tools, over external ones, to superintendents, principals, vice-principals and teachers. A district supported digital learning tool is one that the TDSB has a contract and/or support agreement in place with a company. Amongst other things, the contract/agreement outlines support resources and processes in the event of a technical issue or security incident/concern. The contract/agreement also outlines important privacy items such as content or data ownership.

A list of TDSB supported digital learning tools can be found in Appendix B and includes products and platforms such as G Suite for Education, Brightspace Learning Platform, the Virtual Library and selected tools from Microsoft including Minecraft and Flipgrid. These digital learning tools are accessible from a variety of devices including Chromebooks, iPads and Windows desktops and laptops and also on iOS and Android mobile devices.

## **G Suite for Education**

G Suite for Education provides TDSB students and staff with a suite of online tools that facilitate communication, collaboration and creativity including Classroom, Drive (storage), Docs (word processing) Slides (presentation) Sites (website creation), Gmail, Calendar and more.

G Suite for Education provides the TDSB with a set of management controls that enables the district to manage access to tools, Chromebooks and adjust sharing and privacy settings. For example certain tools, Gmail, are only provided to students beginning in grade 4. The use of Gmail is limited to within the district for grades four and five. In grade six students may send and receive email outside of the district. The G Suite management features also enable TDSB to control which apps, add-ons and extensions are available to students, and are enabled only after approval from TDSB staff.

The Ministry of Education has provided all Ontario school districts with a framework agreement for G Suite for Education which TDSB has adopted. TDSB owns all content stored in the G Suite Cloud. Google does not scan or index this data, they do not create user profiles of students for commercial purposes and there are no advertisements in G Suite for Education.

### **TDSB's Virtual Library**

TDSB's Virtual Library provides every school, student and staff member with digital access to their school library catalogue along with numerous resources and tools to help with research, inquiry and the development of global competencies. In 2018-19, TDSB Library Learning Resources (LLR) engaged in a comprehensive review of each resource linked on the Virtual Library with a data privacy lens and removed resources with concerns to ensure compliance with the *Municipal Freedom of Information and Protection of Privacy Act*. LLR has also developed a [Virtual Library collection development statement](#) that includes continual review of resources to meet data privacy requirements and includes TDSB data privacy language in licence and purchase agreements with vendors.

### **Brightspace Learning Platform**

The Brightspace learning platform is provided to all Ontario school districts by the Ministry of Education. A number of online teaching and learning tools are available including an online classroom, Portfolio for documenting student learning, assessment tools including rubrics, feedback and grades and Brightspace for Parents which provides parents a view of five key areas of their child's online classroom. Brightspace for Parents will be launching in November in TDSB. The TDSB administers the Brightspace system, tools and accounts and retains full ownership over the content placed within it.

### **Professional Learning**

Student Data Privacy has been a priority in a number of professional learning opportunities in recent years. It has been a consistent message with the Digital Lead Learners, Digital Lead Administrators and Teacher Librarians. During these sessions the importance of district provided tools is emphasized along with the risk and liability that may accompany the use of externally provided tools.

This topic has also been addressed with central departments including Special Education and Leadership and Learning.

In the 2018-19 school year a new compliance training course, *Municipal Freedom of Information and Protection of Privacy*, was created by the Privacy office and mandated for a number of school based academic and support staff including teachers, principals, vice-principals, office staff, educational assistants and caretakers.

## Action Plan and Associated Timeline

Earlier this school year the TDSB received some questions about a perceived privacy breach involving YouTube. The concern was related to the personal information of children under the age of thirteen being provided to advertisers through their YouTube accounts. The TDSB followed an established process when investigating and responding to these questions. Our legal team was informed and consulted. Using the G Suite Management console the YouTube settings for our students were examined and verified. TDSB does not provide YouTube accounts to students under the age of thirteen, as per the Terms of Service. This means that while students can view YouTube videos within TDSB they cannot create channels, upload or edit any video content.

The TDSB contacted our G Suite for Education account rep and received the following response from Google's legal team:

"Google has verified that TDSB students would not have been affected via their school-issued accounts, because even if YT was enabled as an additional service we make the statement (on this [page](#)) that "Additional Services may show ads. For G Suite for Education users in Primary/Secondary (K-12) schools, Google does not use any user personal information (or any information associated with a Google Account) to target ads. "

This example helps illustrate the importance of schools, teachers and students using district provided tools in order for resources such as support desks, account representatives and legal services to be available when incidents may arise. These resources help to ensure TDSB student data is safe and that the district is able to act and respond quickly in situations where a concern has arisen.

The TDSB will continue with all the efforts described in this report in order to protect student data and privacy in online learning situations leveraging digital tools and resources. Additionally we are currently examining methods of changing the current student format of the account ID ([firstname.lastname@student.tdsb.on.ca](mailto:firstname.lastname@student.tdsb.on.ca)) to include less information. Approaches being discussed include using the TDSB student number rather than first name and last name or a combination of student number and first/last name. It will be important to strike a balance between privacy and maintaining usability of the system, i.e., making it possible for teachers and students to find each other when wanting to share a document for collaboration purposes.

## Resource Implications

The efforts described in this report have become part of TDSB's standard practice for protecting student data and privacy when examining, implementing and supporting digital learning tools.

## **Communications Considerations**

In efforts to be transparent about the digital learning tools the TDSB provides to students the district began gathering Digital Learning Tool Consent in the 2018-2019 school year. This consent form highlighted the district provided tools, the purpose behind their availability and an opportunity for parents/guardians to consent or decline the use of these tools by their child. If consent was declined the G Suite for Education and Brightspace accounts of that student were deleted. The TDSB is not required by MFIPPA or the Education Act to obtain consent but has chosen to make these efforts to both inform parents and provide them with a choice.

The TDSB is currently planning a Digital Citizenship strategy for all schools that will provide teachers with resources to address important topics related to the safe use of learning online including digital privacy and security, ethical and legal behaviour and managing digital identity. This plan is currently drafted as a monthly effort called “Cyber Mondays”.

Principals and vice principals will continue to be the main contact at schools for this important information along with the Digital Lead Learners and Teacher Librarians. Communication will be delivered through email and posted to internal and external facing web pages.

### **Board Policy and Procedure Reference(s)**

P088 - Acceptable Use of Information Technology Resources Policy

P094 - Freedom of Information and Protection of Privacy Policy

PR571 - Code of Online Conduct

### **Appendices**

- Appendix A: Digital Learning Tool Consent Form
- Appendix B: District Supported Digital Learning Tools

### **From**

Manon Gardner, Associate Director, School Operations and Service Excellence at [Manon.gardner@tdsb.on.ca](mailto:Manon.gardner@tdsb.on.ca)

Peter Singh, Executive Officer, Information Technology & Management Services, Freedom of Information and Privacy Office at [Peter.singh@tdsb.on.ca](mailto:Peter.singh@tdsb.on.ca)



## TDSB Digital Learning Tool Consent Form

As part of our commitment to support learning opportunities for our students focusing on communication, critical thinking & problem solving, collaboration & leadership, global citizenship & character, creativity, inquiry & entrepreneurship, the TDSB provides all students with a variety of digital learning tools including G Suite for Education, Brightspace Online Learning Platform and the TDSB’s Virtual Library. These learning tools are carefully selected for their educational value and compatibility with the Ontario Curriculum to support and enhance teaching and learning.

Some digital learning tools require that the TDSB share limited personal information such as the student’s name and email address for the purpose of creating an account to use the tool or service. Personal information (name and email address) is used and shared by the TDSB for the above-noted purposes under the authority of the Education Act and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). If you have any questions, please contact your school Principal directly.

At the following link, please find a list of district provided digital learning tools that are available to all students and teachers. [bit.ly/TDSBDLT](http://bit.ly/TDSBDLT) (link is case sensitive - type into a web browser exactly as shown).

Please note this form is required for students in grades 3 - 12. Consent for students in Kindergarten - grade 2 may be requested by the teacher if they intend to utilize digital learning tools.

- I do give permission for my child to use district provided Digital Learning Tools. (This consent will remain in effect until it is revoked by me in writing.)
- I do not give permission.

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

TDSB Student Number (9 digits - school can provide if unknown): \_\_\_\_\_

Name of Parent/Legal Guardian: \_\_\_\_\_

Signature of Parent/Legal Guardian: \_\_\_\_\_

Date: \_\_\_\_\_

## TDSB Digital Learning Tools

The following digital learning tools are recommended for use in schools and classrooms. TDSB has support agreements and/or contracts in place with the providers these tools. Schools are strongly encouraged to utilize these tools over external ones that TDSB has no relationship or agreement with. These learning tools are carefully selected for their educational value, curriculum alignment, support and enhancement of teaching and learning and Global Competencies.

### Tools

[Adobe Spark](#)

[Brightspace Learning Platform](#)

[Flipgrid](#)

[G Suite for Education](#)

[Minecraft Education](#)

[My Blueprint](#)

[Read & Write for Chrome](#)

[Scratch](#)


[Virtual Library](#)

### G Suite for Education

Tool	Purpose & Features	Availability
<b>Drive</b> - Docs, Forms, Sheets, Slides	Online & App based document storage (unlimited) including creation tools for documents, surveys, spreadsheets and presentations.	All staff and students.
<b>Gmail</b>	Online and App based email	Students grades 4* - 12 (grades 4 & 5 inside TDSB only), Classroom staff (Teachers, Education Assistants, Early Childhood Educators)
<b>Calendar</b>	Organizing & tracking events	All staff and students.
<b>Classroom</b>	Online classroom tool for communication and sharing of resources and assignments.	All staff and students.
<b>Google+</b>	Online community building tool, web & app formats.	All staff.
<b>Keep</b>	Note taking tool in web & app formats.	All staff and students.
<b>Meet</b>	Video conference tool in web & app formats for. Enables video, audio and screen sharing communication.	All staff, students from grades 9 - 12.
<b>Sites</b>	Web site creation tool for students & teachers. Not intended for school websites.	All staff, students from grades 4 - 12.



TDSB Virtual Library

Tool	Purpose	Availability
<p><a href="#">TDSB Virtual Library</a></p>	<p>Provides convenient access to diverse and trustworthy digital learning resources, supporting literacy, inquiry and Global Competencies.</p> <p>Every school has their own Virtual Library, available through their school website with a link to their catalogue of books &amp; resources and individual myLibrary site.</p> 	<p>All staff, students and families This website is available 24/7 from school and home.</p>
<p><a href="#">Read Watch Learn</a></p>	<p>This portal brings you to content that is licenced/created by the TDSB, Ministry or other public agency for student use. This includes licenced ebooks, encyclopedias, informational databases and other learning tools. The Français button provides this access to French language resources. For example:</p> <ul style="list-style-type: none"> <li>• Capstone Interactive eBooks, great for early literacy and reading engagement with a read-aloud feature</li> <li>• Canadian Points of View, an informational database featuring multiple perspectives surrounding Canadian and global issues</li> </ul>	<p>All staff, students &amp; families (passwords are required outside of the TDSB network-see Learnmark)</p>
<p><a href="#">Find</a></p>	<p>This portal links to external resources that have been carefully selected to support curriculum focussed learning. For example:</p> <ul style="list-style-type: none"> <li>• CBC Kids News, a website great for current events and media literacy</li> <li>• Gapminder, a website with data on</li> </ul>	<p>All staff students &amp; families</p>

	global issues, great for math and numeracy, and global citizenship	
<b>myLibrary</b> Linked through your school's Virtual Library.	The myLibrary site can be customized by local teacher-librarian and teachers to share locally purchased resources selected links, student work, announcements and local community news. For example: <ul style="list-style-type: none"> <li>• A school's subscription to a local newspaper for instructional use</li> <li>• Local student volunteer opportunities</li> </ul>	All staff and students
<a href="#"><u>Inquiry</u></a>	The portal provides access to tools and supports for Inquiry, including the TDSB Research Guide, Imagine the Learning and Implementing Student Inquiry.	All staff and students
<a href="#"><u>Library Catalogue</u></a>	Search Catalogue allows you to search for books and resources in your local school library as well as find streaming video, ebooks, and centrally available instructional and professional resources. For example: <ul style="list-style-type: none"> <li>• A streaming video on digital citizenship</li> <li>• A new title for educators on culturally responsive pedagogy</li> </ul>	All staff, students and families

[Brightspace Learning Platform](#)

Tool	Purpose	Availability
<b>Online Classroom</b>	A fully featured online classroom for blended or fully online learning including tools such as content, assignments, announcements discussions, quizzes and more.	All school based staff and students.
<b>Portfolio</b>	Documenting student learning tool, web & app versions. Parent view coming Sept 2019.	All classroom staff & students
<b>Gradebook</b>	Web based gradebook to track assignments and activities submitted online or face to face.	All teachers
<b>Rubric Maker</b>	Web based tool to create rubrics based on expectations, achievement chart categories or other criteria.	All teachers

<b>Feedback</b>	Provide feedback in text, audio and video formats on submitted assignments including new markup tools & features.	All classroom staff
<b>Conference Scheduler (Parent Interview)</b>	This web based tool enables schools to set up custom conference time slots & parents to select them online.	Principals, vice-principals

**Read & Write for Google Chrome**

<b>Tool</b>	<b>Purpose</b>	<b>Availability</b>
<b>Read &amp; Write Extension for Google Chrome browser</b>	This extension provides several assistive supports including speech to text & text to speech while using the Chrome web browser.	All students & staff.

**Flipgrid**

<b>Tool</b>	<b>Purpose</b>	<b>Availability</b>
<a href="#"><u>Flipgrid</u></a>	Web based tool for video capture, creation and sharing.	All students and school based staff.

**Minecraft**

<b>Tool</b>	<b>Purpose</b>	<b>Availability</b>
<b>Minecraft for Edu</b>	Enables students to design, problem solve and gather resources in worlds created by them and their peers. Windows 10 required, no web version.	All students, all classroom staff.

**Adobe Spark**

<b>Tool</b>	<b>Purpose</b>	<b>Availability</b>
<a href="#"><u>Adobe Spark for Education</u></a>	Enables students to create digital presentations, posters reports and more through a desktop or mobile browser.	All students and classroom staff.

**MyBlueprint**

<b>Tool</b>	<b>Purpose</b>	<b>Availability</b>
<a href="#"><u>My Blueprint</u></a>	Course selection for students in grades 8 - 12 and guidance related activities.	All students, all teachers and administrators.

**Scratch**

Tool	Purpose	Availability
<a href="#">Scratch</a>	Scratch is an online tool for students to code games, animations and stories. Google's <a href="#">CS First</a> Coding curriculum uses Scratch.	Anyone. Additional features come with an accounts required. <a href="#">Teachers can make an account</a> for their class and manage students.