



# Privacy in the Networked Classroom

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Information & Privacy Commissioner of Ontario



Information and Privacy  
Commissioner of Ontario

Commissaire à l'information et à la  
protection de la vie privée de l'Ontario

BIT17 Workshop

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# Information and Privacy Commissioner of Ontario

## What we do

- Provide an **independent** review of provincial and municipal government and public sector decisions and practices concerning access and privacy
- Oversee **compliance** with provincial and municipal access and privacy legislation
- Conduct **research** and deliver **education** and **guidance** on access and privacy issues

# The Three Acts

The IPC oversees compliance with:

- *Freedom of Information and Protection of Privacy Act (FIPPA)*
- *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*
- *Personal Health Information Protection Act (PHIPA)*

# Fair Information Practice Principles

- Accountability
- Identifying Purposes
- Consent
- Limiting Collection
- Limiting Use, Disclosure, Retention
- Accuracy
- Safeguards
- Openness
- Individual Access
- Challenging Compliance

# Privacy Obligations Under *MFIPPA*

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To **collect** personal information, it must be:

- expressly authorized by statute
- used for the purposes of law enforcement, or
- necessary to the proper administration of a lawfully authorized activity

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You can only **use** personal information for:

- the purpose it was collected
- a consistent purpose or with consent (preferably in writing)

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You can only **disclose** personal information:

- with consent
- for a consistent purpose
- to comply with legislation
- for law enforcement
- for health and safety reasons
- for compassionate reasons

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Information must be **retained**

if used by an institution, it must be retained for at least one year

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No **use** unless

accurate  
up to date

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Information must be **protected**

from inadvertent disclosure and unauthorized access

# Privacy and Digital Education at the IPC

*What Students Need to Know  
about Freedom of Information  
and Protection of Privacy*



A Study Guide for Elementary Schools  
Grade 5 Teacher's Guide  
September 2005

## Educational Resources for Youth

- IPC worked with frontline teachers
- Created tools / resources on access & privacy issues for use in teaching plans
- Based on Ontario Ministry of Education curriculum policy
- Three study guides produced for grades 5, 10 and 11/12
- School boards distributed the guides to teachers

# Privacy and Digital Education at the IPC

## Educational Resources: Approach Taken

- Separate materials developed based on age group
- Variety of learning tools, including:
  - Powerpoint presentations
  - Online research activities:
    - “webquests”
    - Quizzes
    - Quick reference infographics
    - Group discussion aids
    - Case studies
    - Privacy in the news

**YOU, ONLINE**  
Personal Branding and Online Privacy:  
A Primer  
(Appendix 3.1)  
This PowerPoint presentation is on the accompanying CD.

**YOU, ONLINE**  
Personal Branding and Online Privacy:  
A Primer

**ONLINE PRIVACY: WHY DOES IT MATTER?**  
• Online postings, by you or others, can take control of your brand out of your hands  
• Wide audience  
• Long-lasting  
• Able to be viewed, copied, downloaded, reposted by virtually anyone  
• Predators, Parents, Professors, Prospective Employers, Police

**WHAT'S IN A BRAND?**  
TIMELESS Professional TRUSTWORTHY  
Eco-friendly  
ELITE Traditional Cool  
Playful Reliable Innovative  
Cutting-edge Elegant MODERN

**YOUR PERSONAL BRAND**  
What you say  
+ What you do  
+ What others say about you  
= Your Reputation

**FREE YOUR HANDS**

**YOUR PERSONAL BRAND**

**PRIVACY: PROTECT IT, RESPECT IT**  
• **Protect**  
• Adjust your privacy settings  
• Use a pseudonym or post anonymously where appropriate  
• Limit message replies  
• **Respect**  
• Don't post compromising photos of others  
• Ask before you tag  
• Don't post sensitive details on walls or other applications  
**THINK BEFORE YOU POST!**

# Privacy and Digital Education at the IPC

## International Resolution on Privacy Education

- IPC a signatory to the 2016 Resolution for the Adoption of an International Competency Framework on Privacy Education
- To meet our commitment to digital education promotion, IPC consulted with the Ministry of Education
- We were pleased to find that all elements of the International Competency Framework on Privacy Education have been integrated into the existing curriculum for Ontario's students
- In addition, specific requirements for privacy and digital education are present in numerous courses and at all grade levels

ICDPPC Resolution: <https://icdppc.org/wp-content/uploads/2015/02/Resolution-2016-on-Privacy-education.pdf>



# Privacy and Digital Education at the IPC

## FPT Working Group on Youth Education

- Ontario is working with IPCs across the country to develop lesson plans for youth on a variety of privacy matters, including:
  - digital economy and personal information
  - permanence of online information
  - rights and responsibilities for online privacy
  - understanding online privacy policies / terms and conditions

# Privacy and Digital Education at the IPC

## **FPT WG Joint Letter to Council of Education Ministers (Nov 2017)**

- Current Media Literacy Week (Nov 6-10) highlights importance of teaching children and teens digital and media literacy skills
- Open letter calls for privacy education to become a “clear and concrete component in digital literacy curricula across the country”
- Letter notes that:
  - online risks are growing (cyberbullying, sexting and child luring, tracking, hacking and email scams)
  - personal information has become a hot commodity as businesses seek to monetize our data
  - everyone, regardless of age, must weigh benefits and risks of each product and service they use, each time they use it

# Privacy in the Networked Classroom



"Before I write my name on the board, I'll need to know how you're planning to use that data."

## Online Educational Tools and Services

- Growing use in Ontario classrooms
- Often used without knowledge or approval of school boards
- Under *MFIPPA*, school boards are responsible for information management practices of educators and service providers


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Think Before You  
**CLICK**

I accept all terms  
and conditions

Could the  
online education  
tool you are using  
expose your students  
and school to privacy  
risks?

**TALK TO YOUR  
PRINCIPAL**

 Information and Privacy  
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protection de la vie privée de l'Ontario

 **OASBO**  
ONTARIO ASSOCIATION OF  
SCHOOL BUSINESSES OFFICIALS

# Online Educational Tools and Services

## Privacy and Access Risks:

### Improper Collection

- personal information of students, parents
- online activities, interactions with others

### Unauthorized Use

- performance evaluations, learning profiles which may be used for marketing purposes

### Unauthorized Disclosure

- sale of personal information to third parties for marketing purposes



# Online Educational Services

What Educators Need to Know



# Online Educational Tools and Services

## Potential Consequences:

- breaches
- complaints
- IPC investigations
- public reports
- notification requirements
- disciplinary procedures
- reputational impacts
- financial impacts



# Online Educational Services

What Educators Need to Know





## Global Privacy Enforcement Network

### 2017 G PEN “Sweep”

- G PEN established to foster cooperation among privacy regulators
- Annual G PEN “Sweep” is a coordinated review of the privacy risks of websites and mobile applications
- 2017 Sweep theme: “User Control over Personal Information”
- IPC collaborated with Office of Privacy Commissioner of Canada to review free online educational services in use across Ontario
- Goal to identify potential areas of concern to guide future awareness and outreach efforts

# 2017 GPEN Report

## Lessons Learned:

- Privacy policies and terms of service were often lengthy, challenging to understand
- Collection and disclosure of student personal information could occur via mobile apps, social login, and browser tracking cookies
- Two-thirds of online services did not have an clear policy on deleting dormant or inactive accounts

## 2017 GPEN Sweep Report Online Educational Services





# 2017 GPEN Report Recommendations

## Best Privacy Protection Practices for School Boards and Educators:

- Consult before selecting online services
- Understand privacy policies and terms of service
- Minimize identifiability of students
- Seek involvement of parents & guardians
- Provide guidance to students on appropriate uses



# Privacy in the Networked Classroom

- Technology in the classroom presents challenges on a number of fronts.
- One of these is privacy – we look forward to the insights gained by today’s discussions.

# CONTACT US

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