

Privacy Impact Assessment for School District No. 61
(Greater Victoria) and School District No. 63 (Saanich)

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Part 1 – General

School District No. 61 (Greater Victoria)

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School District No. 63 (Saanich)

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1. Description of the Initiative

Title: The use of Google Apps for Education (“GAFE”) for educational purposes by School District No. 61 (Greater Victoria) and School District No. 63 (Saanich) together referred to as (the “School Districts”) would like to offer students in grade K - 12 limited access to the Google suite of services included as a part of the GAFE application. GAFE (<http://www.google.ca/enterprise/apps/education/>) offers a number of elements for safe communication and collaboration, email, calendars, document creation and editing in a web browser or a through an app on a tablet or smart phone.

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Staff and students must remember that the purpose of the GAFE tools are for “educational use” and to better meet the needs of learning in a digital age. Therefore, any and all steps must be taken to minimize sensitive and personally identifiable information stored within the GAFE system. Staff and students who are using the GAFE platform need to familiarize themselves with the uses and types of information that are both acceptable and unacceptable ([Appendix C](#)):

Acceptable Uses/Types of Information

Classroom assignments, research notes, presentations, school-based projects
Multimedia objects created by students (videos, pictures, audio files, animations, etc)
Quizzes, tests, exams, surveys
Professional development materials and documents
Summative and formative assessments (e.g., teacher comments, peer feedback, etc)
Calendars for assignment dates, project dead)



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<https://www.sd61.bc.ca/our-district/documents/name/regulation-4216-2-employee-acceptable-use-of-electronic-communications-systems-in-schools/>

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Policy #3130 "Computer Network and Internet Acceptable Use Polic"y

<https://www.sd63.bc.ca/sites/default/files/Policy%20Section%203000%20-%20Educational%20Pro4>

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shared informational pages on the School Districts' www.bcgafe.ca for staff, students, and teachers, as well as, consent forms that conform to legislation requirements.

With respect to consent, students and their parents will be made aware of the fact that those consenting to the use of GAFE may have their personal information stored on servers outside of Canada; therefore, under the laws of foreign jurisdictions, when creating, sharing, and accessing documents within the GAFE environment.

District staff members and students will initiate the request process to a SD61 or SD63 GAFE account through their school district. District Staff members and students will review the requirements on acceptable use, expectations, privacy, and consent.

Chrome Extensions and Add-Ons

1. Read&Write for Google Chrome extension (see [Appendix D](#))

3. Related Privacy Impact Assessments

This privacy impact assessment (PIA) has been adapted from the PIA created by the BC Ministry of Education in facilitating the provision of Microsoft Office 365 cloud-based services for students across BC and to ensure that these services are offered in way that is compliant with . The template for has been adapted for use with GAFE which is a similar offering to the services offered by the original Microsoft Office 365 PIA template.

Included in this PIA ([Appendix E](#)) is a completed checklist that was part of the original Microsoft Office 365 for Education PIA. That PIA stated:

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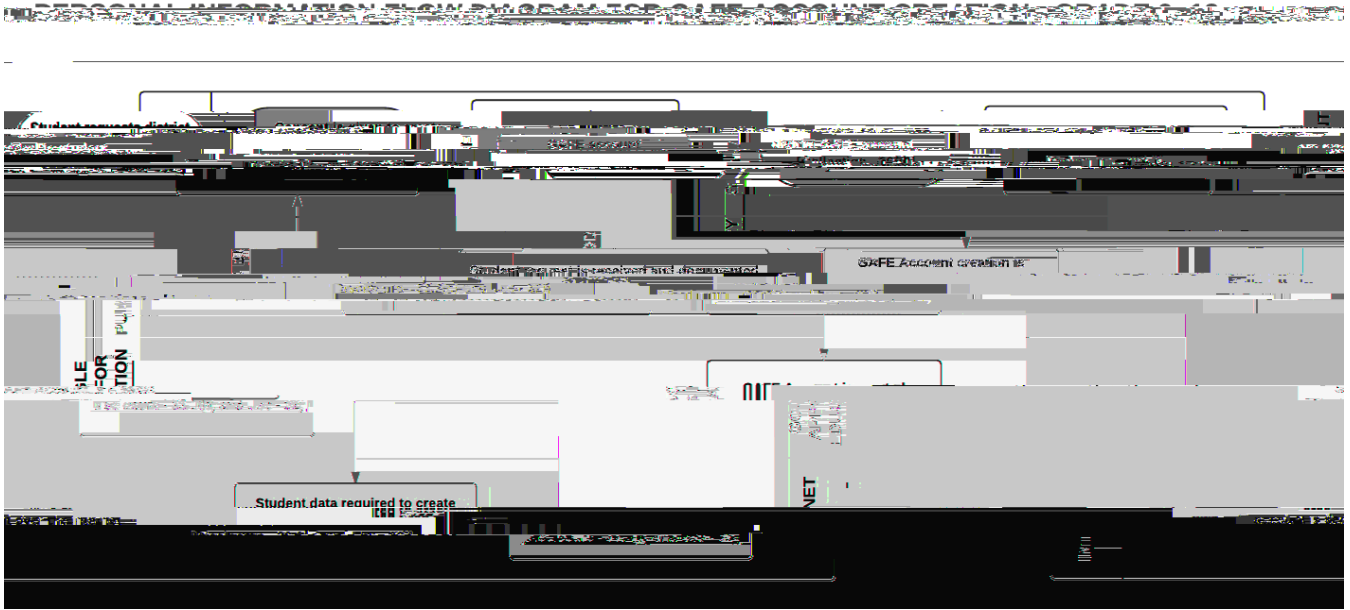
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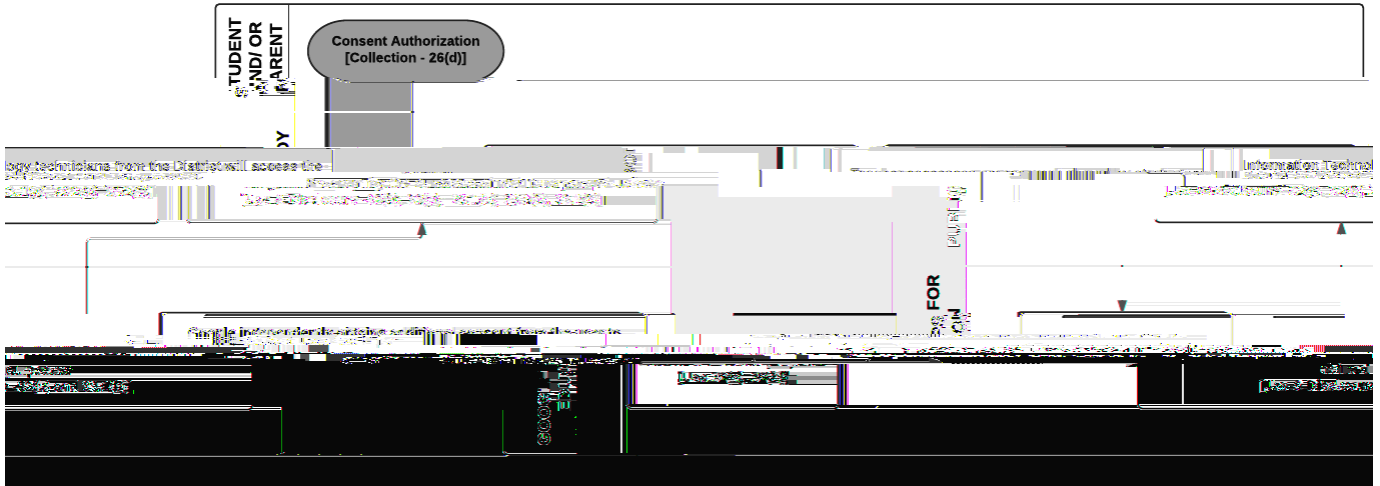
Personal Information Flow Table for Account Creation - Grade 9 - 12

Description/Purpose	T	

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PERSONAL INFORMATION FLOW DIAGRAM FOR GAFE ACCOUNT USE KINDERGARTEN
TO GRADE 12



Personal Information Flow Table for GAFE Account Use - Kindergarten - Grade 12

	Description/Purpose	Type	FOIPPA Authority
1.	Student Consent and Parental Authorization is Sought to Start Using the Program and Collect Personal Information		

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and/or individuals outside of Google if the preservation or disclosure of the information is reasonably necessary to:

- (a) meet an applicable law, regulation, legal process or enforceable governmental request;
- (b) enforce applicable Terms of Service, including investigation of potential violations;
- (c) detect, prevent, or otherwise address fraud, security or technical issues;
- (d) protect against harm to the rights, property or safety of Google and our users or the public as required or permitted by law;
- (e) access account data only when the _____ District System Administrators' grants Google employees explicit permission to do so for troubleshooting purposes; and,

remove any content that violates the Terms of Service by users.

NOTE: District to add and tailor to needs. The able inwip

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		To determine whether a student has been impersonated online, further investigation by system administrators can find the IP address of a user's login, which may be useful in determining the validity of the complaint.		
4	Personal information released by Google - Google shares or sells staff or student information or data to a 3rd party.	In the Google Apps for Education Terms of Agreement Google states that it will not release any personal information unless it is required to do so by law. They have stated that where possible, they will notify the school district of any requests/demands for personal		

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		and services, all their activity is tied to their account, meaning that the potential for any anonymous sharing is removed. GAFE system administrators will be able to identify and when necessary suspend any accounts as a result of any violations.		
5	Unauthorized access to a student account - Administrator or teacher logs in as student to view their content	As part of the introductory training which they will complete, staff will be notified that they must have 'reasonable' grounds to believe that there has been a breach of school rules in order for them to log in to a student's GAFE account without their consent. Teachers are responsible for the care and education of our students. Reasonable rules of conduct must be		

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- Google runs its data centers using custom hardware, running a custom operating system and file system. Each of these systems has been optimized for security and performance. Since Google controls the entire hardware stack, they are able to quickly respond to any threats or weaknesses that may emerge.
- Google's application and network architecture is designed for maximum reliability and uptime. Data is distributed across Google's servers and data centers. If a machine fails—or even an entire data center—your data will still be accessible. Google owns and operates data centers around the world to keep the services you use running 24 hours a day, 7 days a week.
- Google Apps offers a 99.9% service level agreement, and in recent years, they have exceeded this promise; most recently, Gmail achieved 99.978% availability in 2013. Furthermore, Google Apps has no schä1 »d m

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13. Does your branch/department rely on any security policies?

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[Student Acceptable Use of Electronic Communications Systems in Schools Reg 5131.9](#)
[Student Acceptable Use of Electronic Communications Systems in Schools Reg 5131.9\(a\)](#)
[Employee Acceptable Use of Electronic Communications Systems in Schools Reg 4216.2](#)

Name, Title: [Mark Walsh](#), Secretary-Treasurer, Greater Victoria School District 61

Phone Number: [250-475-3212](#)

Email: mwalsh@sd61.bc.ca

School District No. 63 (Saanich)

[School District No. 63 \(Saanich\) Board Policy #3130 "Computer Network and Internet"](#)

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<p><i>Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).</i></p>	
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22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this

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Part 6 – Privacy Office(r) Comments

School District No. 61 (Greater Victoria)

Mark Walsh

Secretary-Treasurer
Privacy Officer/Privacy Office

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Part 7 – Program Area Signatures

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Dear Parent(s)/Guardian(s),

It is an exciting time for teaching and learning in the Saanich School District as we work to equip our students with the skills necessary to thrive in an increasingly digital world. We recognize the significance of embracing appropriate digital technologies and are embracing the use of the Google Apps for Education (GAFE) suite of online tools for students in kindergarten through grade 8.


Participating in a global learning environment extends our classrooms and student learning experiences. An important part of our class work this year involves students using Web-based tools to create and share our learning.

Google Apps for Education will enable students to access email, create, publish and share documents, presentations, videos and websites

GAFE is designed specifically for K-12 school districts and is a powerful suite of school district managed online collaboration and productivity tools. It is a secure, private and ad-free environment and offers more control and protection than an individual Google/Gmail account. GAFE is currently used by thousands of school districts.



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Consent:

Student account information (student first and last name, grade level, and SD63 student identification number), as well as any documents uploaded onto the Google Apps platform will be disclosed and stored to disclosed and stored to Google servers located beyond Canada, and may be subject to the laws of foreign jurisdictions. Privacy legislation requires that we inform you of this and obtain your consent to this arrangement.

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Appendix C

GAFE Acceptable Use Guidelines Use Guidelines for Staff and Students

The School Districts provide access to and manage GAFE accounts for staff and students in the district. These applications are different from public Google applications (such as Gmail) in that they are managed by the district, do not present users with advertising or scan student or staff information for advertising, and allow for more strict filtering and application control by Greater Victoria School District system administrators.

The personal information required for creating GAFE accounts, and any digital files created or uploaded into the platform are located on Google servers that reside outside of Canada, and are therefore subject to the (FIPPA).

The Google Privacy Policy and GAFE Terms of Service state that Google will not share any GAFE information with any 3rd party, except under legal obligation as mentioned in this document below. Therefore, the School Districts cannot guarantee protection of secret disclosures of information to a foreign authority as a consequence of foreign laws.

Consent

For students in Kindergarten - Grade 8

Before a student is provided access to a school district managed GAFE account, consent must be provided by both a parent and student for Kindergarten to Grade 8.

For students in Grade 9 - 12

Before a student is provided access to a school district managed GAFE account, consent must be provided by the student.

Personal Information for Account Creation

The GAFE platform allows school districts to set up, manage and delete staff and student accounts. To create a GAFE account, the following pieces of information are stored on Google servers: first name, last name, grade, district student information number and account password.

Acceptable Use of GAFE

The use of Google Apps for Education student and staff accounts are bound by school board policy.

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Access to SD61 of SD63 GAFE Accounts by Google Administrators

As per the GAFE terms of service and privacy documents, all the personal account information and any content created or uploaded into the SD61 or SD63 GAFE products and services are not owned by Google.


However, as outlined in their privacy policy, Google does maintain the ability to access and share any personal or content data on the SD61 or SD63 GAFE products and services under the following circumstances:

- If Google has obtained additional consent from the user to share personal information;
- or
- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

Designated Google employees will only access account data when a SD61 or SD63 system administrator grants Google explicit permission to do so for troubleshooting purposes. During the course of troubleshooting an issue or other investigation, the Google Support team may ask for the creation of a test administrator account, solely to be used to resolve the particular issue at hand. Google employees or automated systems may also take down any content that violates the Terms of Service.



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Appendix D - SD61 / SD63 GAFE Add-Ons and Extensions

Chrome Extensions and Add-Ons

1. Read&Write for Google Chrome extension

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Policy Statement

Texthelp will:

- Comply with both the law and best practice regarding data security and privacy
- Respect individuals' rights
- Be open and honest with individuals whose data is held
- Provide training and support for staff who handle personal data, so that they can act confidently and consistently

Texthelp recognises that its first priority regarding data security and privacy is to avoid causing harm to individuals. Predominantly this means keeping information securely, on a need to know basis, in the right hands.

The full text of the policy statement is available online here:

<https://docs.google.com/document/d/1pk6zpzneS567My2GRWD6NUyt6ze5t2IE-YJYXraXXvtU/pub>

Read & Write for Google Chrome Risk Analysis Statement & Risk Table

Texthelp have conducted a risk assessment of the data flow and data storage to minimise the risk of the release of personal information. The core principle of our methodology is that we do not store personally identifiable information unless we need to do so to deliver our service. In the case of Read & Write for Google Chrome we do not store any PID. To further reduce the risk of data loss, or unauthorised access to data the following risk mitigations have been put in place:

	Risk	Mitigation	Likelihood	Impact
1	General Data Breach			

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		personally identifiable information. Each student ID is de-identified by a one way cryptographic hash which is irreversible even by our own software engineers.		
2	Hard Disk Theft	To minimise the risk of hard disk or server theft all Texthelp servers for the Read & Write for Google Chrome product are in ISO25001 certified secure locations. To minimise the impact of such a theft, the data is de-identified before secure transmission to the data centre. The data is encrypted at the point of storage.	low	low
3	Texthelp Employee	To minimize the risk of a rogue employee accessing or disclosing personal information the company Data Security Policy includes the following mitigations: <ol style="list-style-type: none"> 1. No personal data is stored in the database. 2. All data access is protected by two factor authentication. 3. No passwords are shared. 4. All personal data is de-identified before being sent to the database. 5. All access to the databases are logged. 6. The database storage and retrieval algorithms are monitored by automated tests on a daily basis. 	low	low

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4	Network Listening	Hacking is an ever present risk, and one of the simplest attacks is to perform a “man in the middle” attack where someone with full access to the network traffic can simply intercept traffic.		
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Data Flow Diagram for Read & Write for Google Chrome



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Appendix E
Checklist and Confirmation Page for GAFE

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The School District has created a new, or implemented an existing Use Policy for students, which dictates what constitutes (or contradicts) "appropriate use" of the application. The Use Policy also very clearly outlines any monitoring that may take place, or any instances in which a GAFE account would be suspended or revoked.	X	

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