

Part 1 – General

School District No. 61 (Greater Victoria)

Name, Title: Ted Pennell, Director of Information Technology

Phone Number: 250-475-3212

Email: tpennell@sd61.bc.ca

Name, Title: Mark Walsh, Secretary-Treasurer

Phone Number: 250-475-3212

Email: mwalsh@sd61.bc.ca

Name, Title: Piet Langstraat, Superintendent of Schools

Phone Number: 250-475-3212

Email: plangstraat@sd61.bc.ca

School District No. 63 (Saanich)

Name, Title: Gregg Ferrie, Director of Information Technology

Phone Number: 250-652-7300

Email: gferrie@sd63.bc.ca

Name, Title: Jason Reid, Secretary-Treasurer

Phone Number: 250-652-7300

Email: jreid@sd63.bc.ca

Name, Title: Keven Elder, Superintendent

Phone Number: 250-652-7300

Email: kelder@sd63.bc.ca

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.

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

Google Apps for Education PIA

The School Districts will provision a GAFE account based on a list of students who have signed and/or have had their parents/guardians sign consent forms. The only data required to provision the account is first name, last name and the School District student information number (not the Personal Education Number), grade level, and school. This will allow the student access to the appropriate collaborative and safe GAFE environment. All consent forms will be stored in student records in each school office. Once this process is complete, student accounts will be created, which will provide the student access to the following products, services and configuration in GAFE:

Students Kindergarten to Grade 8	Students Grade 9 - 12
GAFE email account is limited to only the SD61 or SD63 domains (@sd61learn.ca and @sd61.bc.ca, @sd63.bc.ca)	GAFE email account is not limited
Google Drive (unlimited storage, including docs, sheets, slides, forms, and drawing)	Google Drive (unlimited storage, including docs, sheets, slides, forms, and drawing)
Ability to share data is set to private by default	Ability to share data is set to private by default
Google Drive is limited sharing to only within the SD61 or SD63 domains	Google Drive sharing is not limited
Additional filtering and flagging in GAFE for inappropriate content	Additional filtering and flagging in GAFE for inappropriate content
Limited Google Apps for Education suite of products and services	Complete Google Apps for Education suite of products and services

The use of the GAFE service is not an educational requirement for students. Students will not be required to use these digital tools. All school activities that rely on the use of these digital tools must allow for and accept alternate and equivalent means of student participation. At no time can a student be denied participation in a teacher directed activity because they have not requested a School District GAFE account.

School District No. 61 (Greater Victoria) and School District No. 63 (Saanich) Policy on the Use of GAFE (“Use Policy”):

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

Google Apps for Education PIA

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 deadlines, events
- Communication with teachers and other students related to educational purposes

Unacceptable Uses/Types of Information

- Unnecessary identifiable personal information
- Any identifiable personal information about others who have not provided consent
- Health information and history (e.g., specialist assessments, psychology reports, Individual Education Plans)

GAFE use is intended to aid in the educational process and facilitate the instruction of digital, and online-based skills in order to better equip them for the world around them. As a School District-managed and supported tool, the use of the GAFE tools falls under the School Districts’ current Policies and Regulations as follows:

School District No. 61 (Greater Victoria)

Student Acceptable Use of Electronic Communications Systems in Schools Reg 5131.9

<https://www.sd61.bc.ca/our-district/documents/name/regulation-5131-9-student-acceptable-use-of-electronic-communications-systems-in-schools/>

Student Acceptable Use of Electronic Communications Systems in Schools Reg 5131.9(a)

<https://www.sd61.bc.ca/our-district/documents/name/regulation-5131-9a-student-acceptable-use-of-electronic-communications-systems-in-schools/>

Employee Acceptable Use of Electronic Communications Systems in Schools Reg 4216.2

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

Google Apps for Education PIA

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

School District No. 63 (Saanich)

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

https://www.sd63.bc.ca/sites/default/files/Policy%20Section%203000%20-%20Educational%20Programs%20and%20Services_0.pdf

The Acceptable Use Guidelines ([Appendix C](#)) and Policy and Regulations will be shared widely with staff and students and are available here: www.bcgafe.ca. This helps form the basis for the information provided for those teachers using SD61 and SD63 GAFE with their students, as well as information to share with students.

2. Scope of this PIA

The scope of the *Freedom of Information and Protection of Privacy Act* ("FIPPA") applies to any records in the custody or control of the public body. The School Districts will only maintain custody or control, as contemplated in the *FIPPA*, over those records that are created as a function of the School Districts facilitation of the GAFE Program. For greater certainty, this will include only those emails, assignments, documents, discussion threads, and other records that are created for the purposes set out by the School Districts as outlined in the SD61 or SD63 GAFE Acceptable Use Guidelines ([Appendix C](#)).

Any records created as a result of students' personal use of the Google Apps for Education Program (i.e. outside of the scope of 'educational purposes') will not constitute records in the custody or under the control of the School Districts for the same reasons as those set out in The Ontario Superior Court decision: *City of Ottawa v. Ontario*, 2010 ONSC 6835. In the same way that the records created by the public body employee in question in that court decision that were of a personal nature were deemed to be not in the custody or control of the public body, any records created by students that are personal in nature will be deemed not to be in the custody or control of the School Districts, as all of the same factors are present here.

For the following reasons (but not exclusively so) the records created as a result of personal use will not fall under the custody or control of the School Districts.

The records:

- a) do not relate to the functions or mandate of the School District (i.e. they are of personal nature, not for educational purposes);
- b) are created by the students on a voluntary basis; and

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

Google Apps for Education PIA

- c) are not under the regulatory authority of the School Districts – though they may have possession of the records (i.e. they rest on their provisioned Google Apps for Education servers) they do not have the authority to regulate email use and only have possession of the email records by happenstance.

		Yes	No
a)	Does this PIA involve a common or integrated program/activity (as defined in the FIPPA Act)? And		X
b)	Is the common or integrated program/activity confirmed by the written requirements set out in the regulation?		X
c)	Does this PIA involve a data-linking initiative (as defined in the FIPPA Act)?		X

Purpose/Objectives of the initiative

- To support the School Districts' schools, teachers, and students with their request to provide Google Apps for Education for teaching and learning purposes.
- To assist the School Districts' schools, teachers, and students in providing access to the most relevant and advanced technology tools in order to enhance the learning environment for students.
- Google Apps for Education implementation provides a low-cost solution to provide these tools to students in a secure and cost-effective manner.

What are the potential impacts of this proposal?

While GAFE provides staff and students with access to the similar tools as a 'public' Google account, there are important differences between the two. The School Districts provide access to and manage GAFE accounts for staff and students in their corresponding School Districts. These applications are different from public Google applications (such as a public Gmail account) in that they are managed by the School Districts, do not present users with advertising or scan user information for advertising, and allow for stricter filtering and application control by School Districts' system administrators. Student emails and/or other digital files may be stored on servers outside of Canada. This impact will be managed through policy ([Appendix C](#)), on the appropriate use of the School Districts' GAFE, the creation of

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

Google Apps for Education PIA

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](#))

Read&Write for Google Chrome is a Chrome extension that provides accessibility and productivity tools in the GAFE environment. These include such functions as text-to-speech, dictation, word prediction, picture and talking dictionaries, voice notes, translation, vocabulary lists, and study skills in Google Docs, the Chrome web browser, and documents stored in Google Drive. It also may include Snapverter, which is an optional add-on for Read&Write for Google Chrome that converts printed documents and inaccessible digital files into readable PDF files within Google Drive.

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 *FIPPA*. 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:

“Based on this PIA, a checklist has been created that will serve as a means for School Districts to determine if their use of an Office 365 Solution meets the requirements set out in the FIPPA Act. If a School District meets all of the criteria set out in the checklist, this PIA and accompanying checklist may serve as the School District’s PIA as required under s. 69(5.3) of the FIPPA Act. Each School District is responsible to

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

Google Apps for Education PIA

ensure that it has appropriate authority under the FIPPA Act to collect, use, and disclose any personal information as part of its involvement with this initiative.”

We have included a copy of the Office 365 for Education checklist, modified and completed for the School Districts' GAFE initiative, to show that the School Districts have met the list of requirements needed for a school district to move ahead with providing students access to 'cloud-computing' tool suite as Office 365 or GAFE.

Other related PIAs:

Delta School District GAFE PIA (2014/15) <https://deltalearns.ca/google/>

School District No. 61 (Greater Victoria) GAFE PIA (2014/15) <https://www.sd61.bc.ca/gafe>

4. Elements of Information or Data

For the purposes of setting up the GAFE accounts:

The School Districts will collect, use and disclose to GAFE the first and last name, school district student information number (not Personal Education Number), grade level, and school of the participating students.

Once student accounts are created, the School Districts, through Google, will be collecting student emails and documents (relating to educational purposes – i.e. only those addressed to faculty and staff, and those to other students for school and not personal purposes), and any records created in the collaborative application suite that are created for educational purposes. The types of information acceptable within GAFE have been outlined in the Acceptable Use Guidelines document. ([Appendix C](#))

Part 2 – Protection of Personal Information

Student GAFE accounts will be created for students who provide their consent through either an online request process from the school district's website or through paper consent. Student personal information will be used to for a Google Apps for Education account which may include:

- Student first and last name, grade level, and SD61 or SD63 student identification number
- Classroom assignments, research notes, presentations, school-based projects
- Multimedia objects created by students (e.g., videos, pictures, audio files, animations, etc)
- Summative assessments (e.g., teacher comments, peer feedback, surveys, etc)
- Communication with teachers and other students related to educational purposes
- Indirect direct collection in relation to educational purposes of using GAFE (posting and collection of personal information of others related to educational purposes)

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

Google Apps for Education PIA

Access to GAFE by School District System Administrators

School District System administrators have full access to content stored within the Districts' GAFE environment, however, they will only access content from users' GAFE email or documents in the event of suspected violations to the terms and conditions outlined in the Acceptable Use Guidelines. The user will be notified of a suspension of the account prior to their access to the account.

5. Storage or Access outside Canada

Access to GAFE by Google

As per the GAFE terms of service and Google privacy policy, all the personal account information and any content created or uploaded into the GAFE platform is stored outside Canada. However, the data is owned by the School Districts, depending on the domain (@sd61learn.ca or @sd63.bc.ca/@students.sd63.bc.ca) the user belongs to, and will not be shared or sold to third-party organizations.

As outlined in their privacy policy (https://www.google.com/intl/en_ca/edu/trust/), Google does maintain the ability to access and share any personal or content data on the GAFE platform under the following circumstances:

- If Google has obtained additional consent from the user to share personal information; or
- For legal reasons Google may share personal information with companies, organizations or individuals outside of Google, if that access, use, preservation or disclosure of the information is reasonably necessary to:
 - o meet any applicable law, regulation, legal process or enforceable governmental request.
 - o enforce applicable Terms of Service, including investigation of potential violations.
 - o detect, prevent, or otherwise address fraud, security or technical issues.
 - o protect against harm to the rights, property or safety of Google, our users or the
 - o public as required or permitted by law.

Google employees will access account data only when one of the School Districts' system administrators (depending on the domain the user belongs to) grants Google employees 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

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

Google Apps for Education PIA

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.

In light of these impacts, the School Districts have carefully reviewed the Privacy Policy and the Terms of Service for GAFE, and are satisfied that any potential risks associated with usage are sufficiently low to warrant the usages of this educational tool.

6. Data-linking Initiative*

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.

1. Personal information from one database is linked or combined with personal information from another database;	no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	

7. Common or Integrated Program or Activity*

In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

1. This initiative involves a program or activity that provides a service (or services);	no
--	----

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

Google Apps for Education
PIA

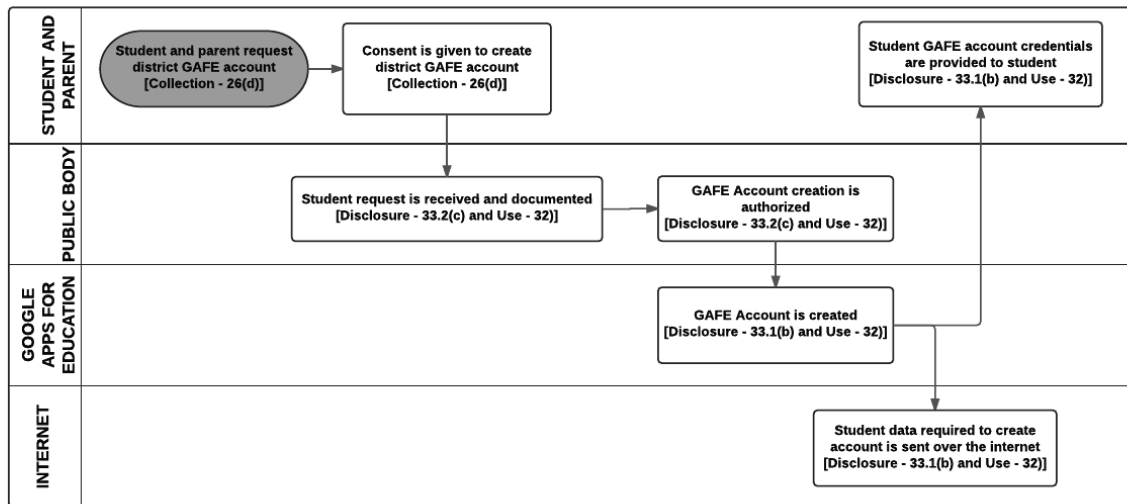
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

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

Google Apps for Education PIA

8. Personal Information Flow Diagram and/or Personal Information Flow Table

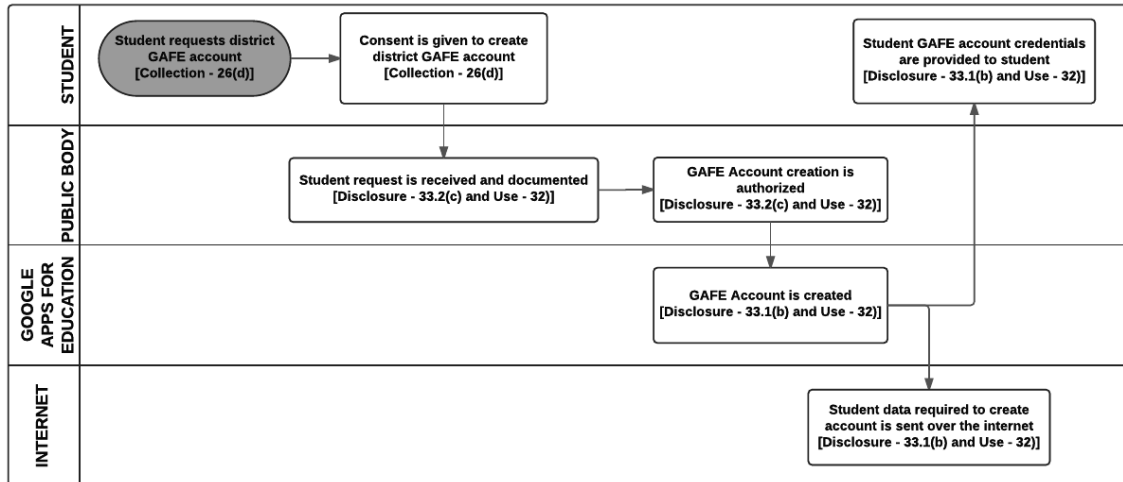
PERSONAL INFORMATION FLOW DIAGRAM FOR GAFE ACCOUNT CREATION FOR KINDERGARTEN TO GRADE 8



Personal Information Flow Table for Account Creation - Grade K - 8			
	Description/Purpose	Type	FOIPPA Authority
1.	Student and Parent request district GAFE account	Collection	26(d)
2.	Consent is given to create district GAFE account	Collection	26(d)
3.	Student and Parent request is received and documented	Collection	26(d)
4.	GAFE account creation is authorized	Disclosure & Use	33.2(c) and 32, 33.1(b)
5.	Student GAFE account is created	Disclosure & Use	33.1(b) and 32
6.	Student data required to create account is sent over the internet	Disclosure & Use	33.1(b) and 32
7.	GAFE account credentials are provided to student	Disclosure & Use	33.1(b) and 32

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

PERSONAL INFORMATION FLOW DIAGRAM FOR GAFE ACCOUNT CREATION - GRADE 9- 12



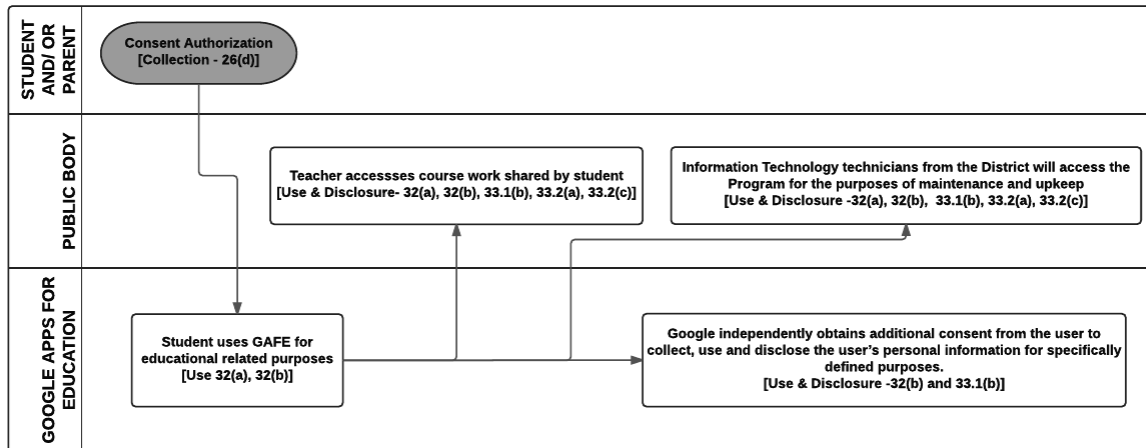
Personal Information Flow Table for Account Creation - Grade 9 - 12

	Description/Purpose	Type	FOIPPA Authority
1.	Student requests district GAFE account	Collection	26(d)
2.	Consent is given to create district GAFE account	Collection	26(d)
3.	Student request is received and documented	Collection	26(d)
4.	GAFE account creation is authorized	Disclosure & Use	33.2(c) and 32, 33.1(c)
5.	Student GAFE account is created	Disclosure & Use	33.1(b) and 32
6.	Student data required to create account is sent over the internet	Disclosure & Use	33.1(b) and 32
7.	GAFE account credentials are provided to student	Disclosure & Use	33.1(b) and 32

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

Google Apps for Education PIA

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	Collection	26(d)
2.	Student uses GAFE education related purposes.	Use	32(a), 32(b)
3.	Teacher accesses course work shared by students for purposes of evaluation and/or monitoring and progress assessment	Use & Disclosure	32(a), 32(b), 33.1(b), 33.2(a), 33.2(c)
4.	Information Technology technicians from the District will access the Program for the purposes of maintenance and upkeep	Use & Disclosure	32(a), 32(b), 33.1(b), 33.2(a), 33.2(c)
5.	Google independently obtains additional consent from the user to collect, use and disclose the user's personal information for specifically defined purposes. Specifically, Google's Terms of Service provide that it may share personal information with companies, organizations	Use & Disclosure	Independently obtained by Google. To the extent

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

Google Apps for Education PIA

<p>and/or individuals outside of Google if the preservation or disclosure of the information is reasonably necessary to:</p> <ul style="list-style-type: none"> (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, <p>remove any content that violates the Terms of Service by users.</p>		<p><i>Google is a "service provider" within the meaning of the Act, this use and disclosure is consistent with sections 32(b) and 33.1(b)</i></p>
<p>NOTE: District to add and tailor to needs. The above is provided as an example – consider how personal information will be collected, used and disclosed and revise.</p>		

Google Apps for Education Administrative details and User terms of service - http://www.google.com/apps/intl/en/terms/user_terms.html

9. Risk Mitigation Table

The School Districts believe that the most important element when considering the adoption of any online tool is the possible implications on student privacy and safety. With that priority in mind, the *School District* acknowledges that the use of any online tool with staff and students comes some possible risk that must be weighed against the educational benefits.

In light of this, the School Districts have carefully reviewed the Privacy Policy and the Terms of Service for GAFE, and are satisfied that any potential risks associated with usage are sufficiently low to warrant the usages of this educational tool.

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

Google Apps for Education PIA

In order to mitigate the risks of adopting Google Apps for Education for our staff and students, we have considered the following:

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Breach of personal information Google - A user's personal information is made public because of a breach of Google's servers.	<p>Google's data centres are geographically distributed across the US and in other countries, in secret locations. Google's computing clusters are designed with resiliency and redundancy in mind, eliminating any single point of failure and minimizing the impact of common equipment failures and environmental risks.</p> <p>Google states that security measures meet the current industry standards for security and reliability.</p> <p>Access to data centres is limited to only authorized Google employees. In the Google Apps for Education Terms of Agreement Google states that they consider our data as important as their own in terms of security.</p>	Low	High
2	Parent or student withdraws consent or refuses to consent	School will produce alternative activity.	Low	Low
3	Student or staff account compromised - A user's GAFE password becomes known another user, the other user can then impersonate them online.	Once notified of such a breach, district system administrator(s) can suspend the Google account. The user (student) can then reset the password through an online district account sync tool using district account credentials.	Low	High

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

Google Apps for Education PIA

		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.	<p>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 information.</p> <p>To further mitigate this risk the Acceptable Use Guidelines recommend avoiding the uploading sensitive and confidential information into the GAFE platform.</p>	Low	High
5.	Sharing of personal information or 3rd party information - Docs or email with personal information or information about someone else is shared more broadly than intended.	<p>All sharing settings in GAFE are set by default to private.</p> <p>In using GAFE, users acknowledge that access to any online tool presents the risk of sharing personal or 3rd party information, particularly as students could use any online tool for personal and/or inappropriate purposes, rather than the appropriate, educational purposes.</p> <p>The SD61 and SD63 recognizes the inherent risk of shared personal or 3rd party information and is mitigating this risk in a number of ways: <i>Through information.</i> All staff and students are asked to review</p>	Medium	Medium

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

Google Apps for Education PIA

		<p>information pages about the GAFE platform prior to requesting a GAFE account, including what is acceptable and unacceptable data to share.</p> <p><i>Through access to information.</i> A district website has been created for staff to use which outlines the privacy issues in using the Greater Victoria GAFE platform. (www.bcgafe.ca)</p> <p><i>Through privacy settings.</i> The default setting for all GAFE files has been set to private. Therefore a staff or student must take steps to intentionally make any created document public. Also, additional features have been added to disable students in grades K-8 from sharing any created document with anyone beyond other users within the SD61 or SD63 GAFE domains.</p> <p><i>Through limiting tool access.</i> We have disabled many of the tools for students K-8 that are part of the Google Apps suite, including Google Sites, Youtube, Google Voice and Google Hangouts, limiting the number of possible channels for information to be inadvertently shared. Limiting the number of tools also allows the district to more closely filter and closely monitor the types of information being shared.</p> <p><i>Through named accounts.</i> As students use any online tool there is the potential for sharing personal or 3rd party confidential information. When students use GAFE products</p>		
--	--	---	--	--

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

Google Apps for Education PIA

		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	<p>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.</p> <p>Teachers are responsible for the care and education of our students. Reasonable rules of conduct must be allowed to be maintained by staff members, whether the conduct takes place on school property or at a school sanctioned event.</p>	Low	High
6	Advertising - Using online tools such as Google Apps presents students with advertising, or sells student information to advertisers.	As per the Google Apps for Education Terms of Service, Google does not serve ads nor use customer data for the purpose of advertising.	Low	Medium
7	Change in Google Terms of Service - Online tools such as Google change their privacy policies or terms of service.	<p>As part of their GAFE terms of service Google maintains the right to modify the terms of their service. However, Google states in the terms of service that system administrators will be informed of any changes.</p> <p>Also, Google states in the Privacy Policy that they will not make any</p>	Low	Medium

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

Google Apps for Education PIA

		changes which reduce customer rights without explicit consent. Additionally, SD61 or SD63 have appointed an employee who will review Google's Privacy Policy and GAFE Terms annually. Should any significant modifications be implemented by Google, the District IT committee will review the modifications and, if needed, terminate the agreement with Google.		
--	--	---	--	--

10. Collection Notice

GAFE services will be provided to those who are confirmed as students and staff of the School Districts. Participating students, will provide consent (students and parents/guardians for grades K-8, students only for grades 9-12) acknowledging that their personal information may be disclosed, stored and accessed beyond and/or outside of Canada. The School Districts will facilitate the consent-gathering by sending home with every student a letter of intent for grades K - 12 (Appendix A) along with a consent form for grades K - 8 (Appendix B). ([Appendix A/B K-8 School District No. 61 \(Greater Victoria\)](#), [Appendix A 9-12 School District No. 61 \(Greater Victoria\)](#)) ([Appendix A/B K-8 School District No. 63 \(Saanich\)](#), [Appendix A 9-12 School District No. 63 \(Saanich\)](#))

The consent forms will meet the criteria set out in the *Freedom of Information and Protection of Privacy Regulation* (http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/96165_00).

Part 3 – Security of Personal Information

11. Please describe the physical security measures related to the initiative (if applicable).

Not applicable.

12. Please describe the technical security measures related to the initiative (if applicable).

Google Apps for Education Security Policy details:

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

Google Apps for Education PIA

- 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 scheduled downtime or maintenance windows. Unlike most providers, they do not plan for our applications to be unavailable, even when they are upgrading our services or maintaining our systems.
- Google products are scrutinized by privacy, security and compliance specialists throughout the product lifecycle. This helps ensure that data is handled appropriately and no unwarranted access is allowed or possible.
- Administrators can elect to receive notifications when events occur, such as suspicious login attempts, or service setting changes by other administrators.
- Google is constantly working to extend and strengthen encryption across more services and links.
- Google is the first major cloud provider to enable perfect forward secrecy, which encrypts content as it moves between our servers and those of other companies. Many industry peers have followed suit or have committed to adoption in the future.
- Every single email message you send or receive—100% of them—is encrypted while moving internally. This ensures that your messages are safe not only when they move between you and Gmail's servers, but also as they move between Google's data centers.
- To protect against cryptanalytic advances, last year Google doubled the length of our RSA encryption keys to 2048 bits and they change them every few weeks raising the bar for the rest of the industry.
- Google has long enjoyed a close relationship with the security research community. To honor all the cutting edge external contributions that help Google keep our users safe, they maintain a Vulnerability Reward Program for Google owned web properties. Google was the first major cloud provider to offer a program of this type.

For more Information on Google Apps for Education security policies please visit:
https://drive.google.com/a/sd63.bc.ca/file/d/0B_OTXR_u3Rbbmh5WE5NZVRyOEK/edit

All students and staff are required to have an 8 character password that meet the Google Apps for Education password requirement.

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

Google Apps for Education
PIA

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

School District No. 61 (Great Victoria)

[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 Acceptable Use Policy"](#)

Name, Title: Jason Reid, Secretary-Treasurer, Saanich School District (No. 63)

Phone Number: 250-652-7300

Email: jreid@sd63.bc.ca

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

Access to data containing personal information is based on the roles of individual users within an GAFE. With in this context, the ability of individual users to access data (such as view, create, or modify a file) containing personal information will be limited to their role and permissions.

15. Please describe how you track who has access to the personal information.

Audits will be conducted periodically to track and monitor that GAFE is being used in accordance with the School Districts' acceptable use policy. Individual users will be encouraged to audit who they provide access to personal information within GAFE and make changes as necessary.

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

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

Google Apps for Education
PIA

Personal information is updated continually using the School District's student information system. If there are errors, individual users may contact the school and district student information system administrators to update any inaccuracies.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

Yes. Data created by students may be used for educational purposes including summative and formative assessment.

18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

All data created by users is only accessible by that user, unless it is shared by that user with others.

19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

GAFE accounts will be suspended for one year after a student graduates or leaves the School Districts. After that one year period, all suspended student accounts and data contained within will be deleted.

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No.

<p><i>Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).</i></p>	
---	--

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

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

Google Apps for Education
PIA

<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>	
--	--

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 information is required to be published in a public directory.

No.

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

Google Apps for Education
PIA

Part 6 – Privacy Office(r) Comments

School District No. 61 (Greater Victoria)

Mark Walsh

Secretary-Treasurer
Privacy Officer/Privacy Office
Representative

Signature

Date

School District No. 63 (Saanich)

Jason Reid

Secretary-Treasurer
Privacy Officer/Privacy Office
Representative

Signature

Date

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

Google Apps for Education
PIA

Part 7 – Program Area Signatures

School District No. 61 (Greater Victoria)

Ted Pennell

Director of Information
Technology

Signature

Date

Piet Langstraat

Superintendent of School

Signature

Date

School District No. 63 (Saanich)

Gregg Ferrie

Director of Information
Technology

Signature

Date

Keven Elder

Superintendent of Schools

Signature

Date

A final copy of this PIA (with all signatures) must be kept on record.

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

Google Apps for Education PIA

Dear Parent(s)/Guardian(s),

It is an exciting time for teaching and learning in the School District No. 61 (Greater Victoria) as we work to equip our students with the skills necessary to thrive in an increasingly digital world. We recognize the significance of access to appropriate digital technologies and are embracing the use of the Google Apps for Education (GAFE) suite of online tools for students in grades 9 through 12.

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 universities 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 schools and post-secondary institutions, with tens of millions of student accounts around the world.

As a public institution, we are subject to the *BC Freedom of Information and Protection of Privacy Act*. In accordance with this Act, we must at all times protect the privacy of students under our care. Therefore students will receive instruction on how to use their district managed GAFE account in ways that avoid posting private and personal information. Detailed information on the GVSD GAFE offering, including a list of educational uses, privacy, and acceptable and unacceptable use can be accessed at: www.bcgafe.ca

The following Google Apps for Education services apply to students (Grades 9-12):

- GAFE email account
- Google Drive (unlimited storage, including docs, sheets, slides, forms, and drawing)
- Complete Google Apps for Education suite of products and services

Students will also have access to Read&Write by TextHelp. Read&Write for Google Chrome is a Chrome extension that provides accessibility and productivity tools in the GAFE environment.

- Read & Write for Google Chrome can be delivered in its entirety without storing any personally identifiable information. Each student ID is de-identified by a one way cryptographic hash which is irreversible.
- Texthelp uses Google Analytics to track usage of the software. This is done anonymously using de-identified user IDs.

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

Google Apps for Education PIA

This letter is to inform you that your child can request a GAFE account by providing their consent through an online request process from the school district's website. Your child's personal information will be used for a Google Apps for Education account which may include:

- Student first and last name, grade level, and SD61 student identification number
- Classroom assignments, research notes, presentations, school-based projects
- Multimedia objects created by students (e.g., videos, pictures, audio files, animations, etc)
- Summative assessments (e.g., teacher comments, peer feedback, surveys, etc)
- Communication with teachers and other students related to educational purposes
- Indirect direct collection in relation to educational purposes of using GAFE (posting and collection of personal information of others related to educational purposes)

As per the GAFE terms of service and privacy documents, all the personal account information and any content created or uploaded into the School District No. 61 (Greater Victoria) 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 School District No. 61 (Greater Victoria) 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 School District No. 61 (Greater Victoria) 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.

While this is not an educational requirement, we hope that students will see the value in these tools for their education. If students choose not to grant permission, an alternative resource will be provided.

If you have questions about the intended use of GAFE in your child's learning, please speak with your child's principal.

Sincerely,
Ted Pennell
Director of Informational Technology, School District No. 61 (Greater Victoria)

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

Google Apps for Education PIA

Dear Parent(s)/Guardian(s),

It is an exciting time for teaching and learning in the Saanich School District (No. 63) as we work to equip our students with the skills necessary to thrive in an increasingly digital world. We recognize the significance of access to appropriate digital technologies and are embracing the use of the Google Apps for Education (GAFE) suite of online tools for students in grades 9 through 12.

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 universities 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 schools and post-secondary institutions, with tens of millions of student accounts around the world.

As a public institution, we are subject to the *BC Freedom of Information and Protection of Privacy Act*. In accordance with this Act, we must at all times protect the privacy of students under our care. Therefore students will receive instruction on how to use their district managed GAFE account in ways that avoid posting private and personal information. Detailed information on the SD63 GAFE offering, including a list of educational uses, privacy, and acceptable and unacceptable use can be accessed at: www.bcgafe.ca

The following Google Apps for Education services apply to students (Grades 9-12):

- GAFE email account
- Google Drive (unlimited storage, including docs, sheets, slides, forms, and drawing)
- Complete Google Apps for Education suite of products and services

Students will also have access to Read&Write by TextHelp. Read&Write for Google Chrome is a Chrome extension that provides accessibility and productivity tools in the GAFE environment.

- Read & Write for Google Chrome can be delivered in its entirety without storing any personally identifiable information. Each student ID is de-identified by a one way cryptographic hash which is irreversible.
- Texthelp uses Google Analytics to track usage of the software. This is done anonymously using de-identified user IDs.

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

Google Apps for Education PIA

This letter is to inform you that your child can request a GAFE account by providing their consent through an online request process from the school district's website. Your child's personal information will be used to for a Google Apps for Education account which may include:

- Student first and last name, grade level, and SD63 student identification number
- Classroom assignments, research notes, presentations, school-based projects
- Multimedia objects created by students (e.g., videos, pictures, audio files, animations, etc)
- Summative assessments (e.g., teacher comments, peer feedback, surveys, etc)
- Communication with teachers and other students related to educational purposes
- Indirect direct collection in relation to educational purposes of using GAFE (posting and collection of personal information of others related to educational purposes)

As per the GAFE terms of service and privacy documents, all the personal account information and any content created or uploaded into the School District No. 63 (Saanich) 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 School District No. 63 (Saanich) 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 School District No. 63 (Saanich) 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.

While this is not an educational requirement, we hope that students will see the value in these tools for their education. If students choose not to grant permission, an alternative resource will be provided.

If you have questions about the intended use of GAFE in your child's learning, please speak with your child's principal.

Sincerely,
Gregg Ferrie
Director of Information Technology, Saanich School District (No. 63)

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

Google Apps for Education PIA

School District No. 63 (Saanich) Google Apps For Education Account Consent:

Student account information (student first and last name, grade level, and SD63 identification number), as well as any documents uploaded onto the Google Apps platform will be disclosed and stored to secure 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.

The following Google Apps for Education services apply:

GAFE email account is not limited
Google Drive (unlimited storage, including docs, sheets, slides, forms, and drawing)
Ability to share data is set to private by default
Google Drive sharing is not limited
Additional filtering and flagging in GAFE for inappropriate content
Complete Google Apps for Education suite of products and services
Read&Write by TextHelp extension for Google Chrome

I have read this consent form and understand that my personal information will be used for a Google Apps for Education account which may include:

- Student first and last name, grade level, and SD63 identification number
- Classroom assignments, research notes, presentations, school-based projects
- Multimedia objects created by students (e.g., videos, pictures, audio files, animations, etc)
- Summative assessments (e.g., teacher comments, peer feedback, surveys, etc)
- Communication with teachers and other students related to educational purposes
- Indirect direct collection in relation to educational purposes of using GAFE (posting and collection of personal information of others related to educational purposes)

This consent will be considered valid from the date at which it is signed until September 30 of the following school year or when permission has been explicitly withdrawn.

Students Name (first & last) _____ Grade: _____

Student's Signature: _____ Date: _____

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

Google Apps for Education PIA

Dear Parent(s)/Guardian(s),

It is an exciting time for teaching and learning in the Greater Victoria 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 access to 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 schools, with tens of millions of student accounts around the world.

Students will also have access to Read&Write by TextHelp. Read&Write for Google Chrome is a Chrome extension that provides accessibility and productivity tools in the GAFE environment.

- Read & Write for Google Chrome can be delivered in its entirety without storing any personally identifiable information. Each student ID is de-identified by a one way cryptographic hash which is irreversible.
- Texthelp uses Google Analytics to track usage of the software. This is done anonymously using de-identified user IDs.

As a public institution, we are subject to the *BC Freedom of Information and Protection of Privacy Act*. In accordance with this Act, we must at all times protect the privacy of students under our care. Therefore students will receive instruction on how to use their district managed GAFE account in ways that avoid posting private and personal information. Detailed information on the GVSD GAFE offering, including a list of educational uses, privacy, and acceptable and unacceptable use can be accessed at: www.bcgafe.ca

While this is not an educational requirement, we hope that you will see the value in these tools for your child. If you choose to grant permission, please sign the consent form along with your son/daughter's signed consent and return it to your child's classroom teacher who will then provide further instructions to your child on how to access and use GAFE.

As per the GAFE terms of service and privacy documents, all the personal account information and any content created or uploaded into the School District No. 61 (Greater Victoria) GAFE products and services are not owned by Google.

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

Google Apps for Education PIA

However, as outlined in their privacy policy, Google does maintain the ability to access and share any personal or content data on the School District No. 61 (Greater Victoria) 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 School District No. 61 (Greater Victoria) 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.

If you have questions about the intended use of GAFE in your child's classroom, please speak with your child's principal.

Sincerely,

Ted Pennell
Director of Informational Technology

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

Google Apps for Education PIA

Consent:

Student account information (student first and last name, grade level, and last 4 digits of SD61 identification number), as well as any documents uploaded onto the Google Apps platform will be disclosed and stored to secure 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.

The following Google Apps for Education services apply:

Students (Grades K-8)
GAFE email account is limited to only GVSD domains (@sd61learn.ca and @sd61.bc.ca)
Google Drive (unlimited storage, including docs, sheets, slides, forms, and drawing)
Ability to share data is set to private by default
Google Drive is limited sharing to only @sd61learn.ca
Google Calendar, Google Sites and Google Classroom
Read&Write by TextHelp extension for Google Chrome

I have read this consent form and understand that my child's personal information will be used for a Google Apps for Education account which may include:

- Student first and last name, grade level, and SD61 identification number
- Classroom assignments, research notes, presentations, school-based projects
- Multimedia objects created by students (e.g., videos, pictures, audio files, animations, etc)
- Summative assessments (e.g., teacher comments, peer feedback, surveys, etc)
- Communication with teachers and other students related to educational purposes
- Indirect direct collection in relation to educational purposes of using GAFE (posting and collection of personal information of others related to educational purposes)

This consent will be considered valid from the date at which it is signed until September 30 of the following school year or when permission has been explicitly withdrawn.

Students Name (first & last) _____ Grade: _____

Student's Signature: _____ Date: _____
(Required for grades 4-8 only)

Parent/Guardian Signature: _____ Date: _____

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

Google Apps for Education PIA

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 access to 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 schools, with tens of millions of student accounts around the world.

Students will also have access to Read&Write by TextHelp. Read&Write for Google Chrome is a Chrome extension that provides accessibility and productivity tools in the GAFE environment.

- Read & Write for Google Chrome can be delivered in its entirety without storing any personally identifiable information. Each student ID is de-identified by a one way cryptographic hash which is irreversible.
- Texthelp uses Google Analytics to track usage of the software. This is done anonymously using de-identified user IDs.

As a public institution, we are subject to the *BC Freedom of Information and Protection of Privacy Act*. In accordance with this Act, we must at all times protect the privacy of students under our care. Therefore students will receive instruction on how to use their district managed GAFE account in ways that avoid posting private and personal information. Detailed information on the SD63 GAFE offering, including a list of educational uses, privacy, and acceptable and unacceptable use can be accessed at: www.bcgafe.ca

While this is not an educational requirement, we hope that you will see the value in these tools for your child. If you choose to grant permission, please sign the consent form along with your son/daughter's signed consent and return it to your child's classroom teacher who will then provide further instructions to your child on how to access and use GAFE.

As per the GAFE terms of service and privacy documents, all the personal account information and any content created or uploaded into the School District No. 63 (Saanich) GAFE products and services are not owned by Google.

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

Google Apps for Education PIA

However, as outlined in their privacy policy, Google does maintain the ability to access and share any personal or content data on the School District No. 63 (Saanich) 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 School District No. 63 (Saanich) 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.

If you have questions about the intended use of GAFE in your child's classroom, please speak with your child's principal.

Sincerely,

Gregg Ferrie
Director of Information Technology, Saanich School District (No. 63)

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

Google Apps for Education PIA

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.

The following Google Apps for Education services apply:

Students (Grades K-8)
GAFE email account is limited to only SD63 domains (@student.sd63.bc.ca and @sd63.bc.ca)
Google Drive (unlimited storage, including docs, sheets, slides, forms, and drawing)
Ability to share data is set to private by default
Google Drive is limited sharing to only (@student.sd63.bc.ca and @sd63.bc.ca)
Google Calendar, Google Sites and Google Classroom
Read&Write by TextHelp extension for Google Chrome

I have read this consent form and understand that my child's personal information will be used for a Google Apps for Education account which may include:

- Student first and last name, grade level, and SD63 student identification number
- Classroom assignments, research notes, presentations, school-based projects
- Multimedia objects created by students (e.g., videos, pictures, audio files, animations, etc)
- Summative assessments (e.g., teacher comments, peer feedback, surveys, etc)
- Communication with teachers and other students related to educational purposes
- Indirect direct collection in relation to educational purposes of using GAFE (posting and collection of personal information of others related to educational purposes)

This consent will be considered valid from the date at which it is signed until September 30 of the following school year or when permission has been explicitly withdrawn.

Students Name (first & last) _____ Grade: _____

Student's Signature: _____ Date: _____
(Required for grades 4-8 only)

Parent/Guardian Signature: _____ Date: _____

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

Google Apps for Education PIA

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 *Freedom of Information and Protection of Privacy Act* (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.

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

Google Apps for Education PIA

School District No. 61 (Greater Victoria)

[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](#)

School District No. 63 (Saanich)

[Saanich School District Board Policy #3130 "Computer Network and Internet Acceptable Use Policy"](#)

As an overview, these documents state that users will conduct themselves in a courteous, ethical and responsible manner while using all district technology resources, which will be extended to include the GAFE products and services.

Personal account information and any created or uploaded content is hosted by Google servers, therefore, there are important limitations to the types of information that can be shared within the GAFE products and services.

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 ensure that sensitive and personally identifiable information is not shared in any emails, files and documents created or uploaded into GAFE products and services.

Staff and students who are accessing the GAFE products and services need to familiarize themselves with the uses and types of information that are both acceptable and unacceptable. These recommendations are for users who have requested access to the GAFE products and services through parent and student consent:

Acceptable Uses/Types of Information

- Classroom assignments, research notes, presentations, school-based projects
- Multimedia objects created by students (e.g., videos, pictures, audio files, animations, etc)
- Quizzes, tests, exams, surveys
- Summative and Formative assessments (e.g., teacher comments, peer feedback, etc)
- Communication with teachers and other students related to educational purposes

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

Google Apps for Education PIA

- Indirect direct collection in relation to educational purposes of using GAFE (posting and collection of personal information of others related to educational purposes)

Unacceptable Uses/Types of Information

- Unnecessary identifiable personal information
- Any identifiable personal information about others who have not provided consent
- Health information and history (e.g., specialist assessments, psychology reports, Individual Education Plans)

Inappropriate or prohibited use of GAFE will be also subject to the terms defined by district policy and regulations.

Access to GAFE by SD61 or SD63 System Administrators

System administrators have full access to content stored within SD61 or SD63 GAFE domains, however, they will only access content from users' GAFE email or documents in the event of suspected violations to the terms and conditions outlined in the acceptable use policy and regulations outlined in school board policy (see below).

School District No. 61 (Greater Victoria)

[Student Acceptable Use of Electronic Communications Systems in Schools Reg 5131.9](https://www.sd61.bc.ca/our-district/documents/name/regulation-5131-9-student-acceptable-use-of-electronic-communications-systems-in-schools/)

<https://www.sd61.bc.ca/our-district/documents/name/regulation-5131-9-student-acceptable-use-of-electronic-communications-systems-in-schools/>

[Student Acceptable Use of Electronic Communications Systems in Schools Reg 5131.9\(a\)](https://www.sd61.bc.ca/our-district/documents/name/regulation-5131-9a-student-acceptable-use-of-electronic-communications-systems-in-schools/)

<https://www.sd61.bc.ca/our-district/documents/name/regulation-5131-9a-student-acceptable-use-of-electronic-communications-systems-in-schools/>

[Employee Acceptable Use of Electronic Communications Systems in Schools Reg 4216.2](https://www.sd61.bc.ca/our-district/documents/name/regulation-4216-2-employee-acceptable-use-of-electronic-communications-systems-in-schools/)

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

School District No. 63 (Saanich)

[Saanich School District Board Policy #3130 "Computer Network and Internet Acceptable Use Policy"](https://www.sd63.bc.ca/sites/default/files/Policy%20Section%203000%20-%20Educational%20Programs%20and%20Services_0.pdf)

https://www.sd63.bc.ca/sites/default/files/Policy%20Section%203000%20-%20Educational%20Programs%20and%20Services_0.pdf

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

Google Apps for Education PIA

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.

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

Google Apps for Education PIA

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

Chrome Extensions and Add-Ons

1. Read&Write for Google Chrome extension

Read&Write for Google Chrome is a Chrome extension that provides accessibility and productivity tools in the GAFE environment. These include such functions as text-to-speech, dictation, word prediction, picture and talking dictionaries, voice notes, translation, vocabulary lists, and study skills in Google Docs, the Chrome web browser, and documents stored in Google Drive. It also may include Snapverter, which is an optional add-on for Read&Write for Google Chrome that converts printed documents and inaccessible digital files into readable PDF files within Google Drive.

Potential impact and risk assessment:

The following section of the document outlines the risks and impacts of a data security breach. Included are summaries or links to detailed copies of:

- Texthelp's Privacy Policy for Google Products
- Texthelp's Data Security Policy
- Read & Write for Google Chrome Data Breach Risk Analysis and Mitigation
- Details of anonymous metadata stored in Analytics
- A data flow diagram

Texthelp Privacy Policy

At Texthelp, we are committed to safeguarding and preserving the privacy of our website visitors and product users. This Privacy Policy explains what happens to any personal data that you provide to us or that we collect from you while you use our software or visit our site. Texthelp have signed the [Student Data Pledge](#). Our privacy policy is available online to view: <https://support.texthelp.com/index.php?action=artikel&cat=5&id=140>

Texthelp Data Security Policy

The purpose of this policy is to enable Texthelp to:

- Comply with the law in respect of the data it holds about individuals;
- Follow best practice; and
- Protect Texthelp's customers and users.

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

Google Apps for Education PIA

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/1pk6zpnS567My2GRWD6NUyt6ze5t2IE-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	Because of the sensitivity surrounding the storage of personally identifiable information, Texthelp does not store any personally identifiable information unless it is required to deliver the functionality of the product. In the case of Read & Write for Google Chrome the functionality can be delivered in its entirety without storing any	low	low

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

Google Apps for Education PIA

		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

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

Google Apps for Education PIA

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 access to the network traffic can simply listen to traffic. To avoid this all data flow is carried out over HTTPS using the latest SSL certificates.	medium	low
---	-------------------	---	--------	-----

Data collected in Analytics

Texthelp uses Google Analytics to track usage of the software. This is to provide users with insight about the traffic load over time, geography and technology platforms that our users are making use of. Because our software is offered as a Freemium Premium product we also if the user is a Free or Premium user. All this is done anonymously using de-identified user IDs. We can track the Domain or School Board, but not the individual user name.

Geography

- Country
- State
- City
- Network Provider

This may be inaccurate - it is based on IP address. This helps us plan server locations, and time zone related services.

Technology

- OS & Version
- Browser & Version
- Screen Resolution
- Screen Colours
- Javascript
- Java Supported
- Flash Supported

This is to help us understand what devices people are using to help us design a good and reliable user experience for the majority of our sessions.

Activity

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

Google Apps for Education PIA

- Buttons pressed
- Session Count
- Session Duration
- Session Times
- Response Times
- Abandonment
- Web Domain for speech

This is to help us understand what features and websites are being used most. Our QA team include the busiest web domains in their test plans so that we can be compatible.

Licencing

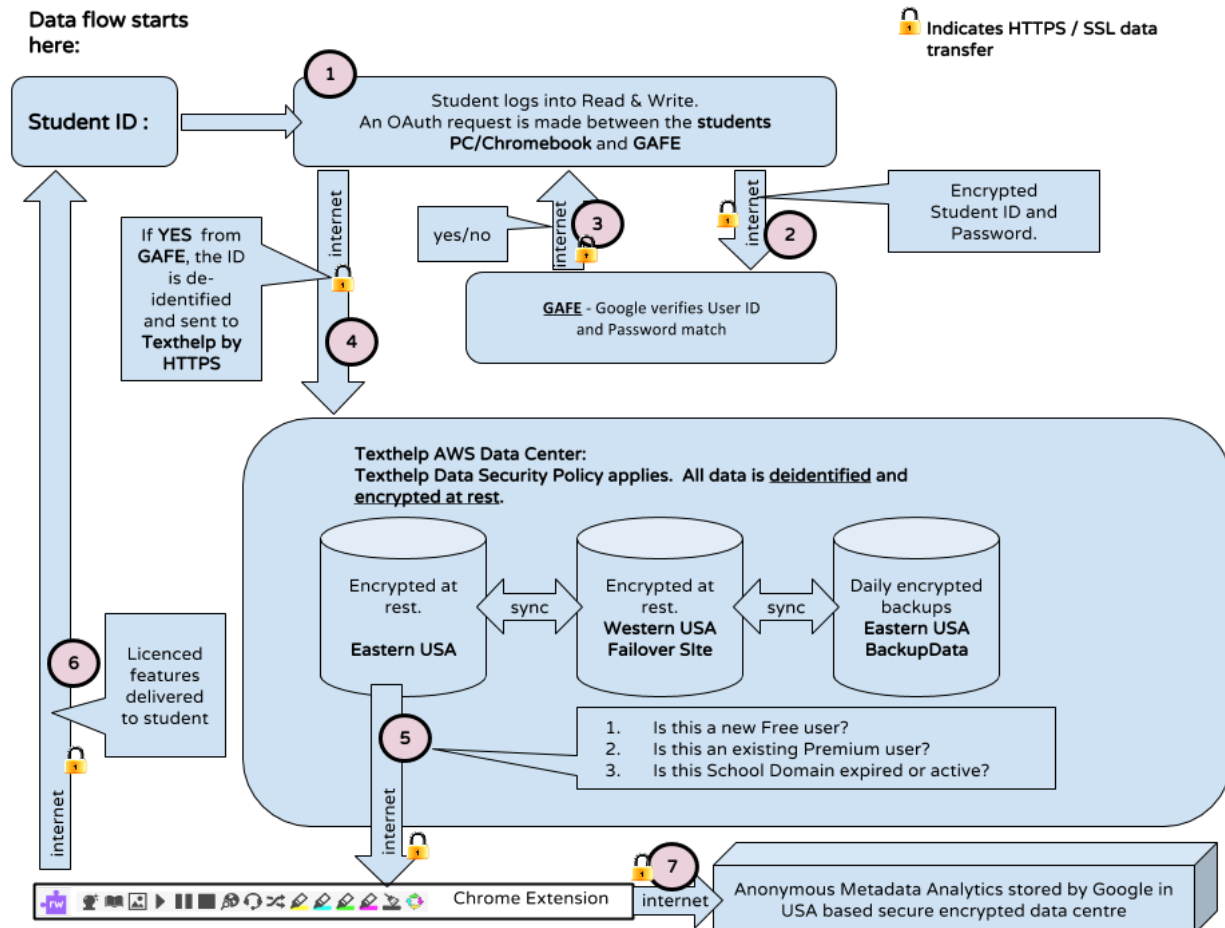
- Free
- Premium
- Group
- Unlimited
- Domian

This is simply to determine if we should provide the user with free or premium features.

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

Google Apps for Education PIA

Data Flow Diagram for Read & Write for Google Chrome



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

Google Apps for Education PIA

Appendix E Checklist and Confirmation Page for GAFE

School District _____ School District No. 61 (Greater Victoria) _____
_____ School District No. 63 (Saanich) _____

School District's GAFE Administrator _____ Paul Landry (SD61) _____
_____ Herman Kolkema (SD63) _____

Email _____ plandry@sd61.bc.ca _____

Email _____ hkolkema@sd63.bc.ca _____

This checklist is to be completed to determine if a School District meets the criteria set out in this PIA. A School District whose Google Apps for Education implementation does not meet the criteria of this checklist will have to complete their own PIA, in accordance with section 69(5.3) of the *Freedom of Information and Protection of Privacy Act*.

For the purposes of this Appendix, "Use Policy" has the same meaning as that established in the PIA – the School District's Use Policy on the Use of Google Apps for Education.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
Notification and Consent A "Collection Notice", meeting the requirements of section 27(2) of the <i>Freedom of Information and Protection of Privacy Act</i> has been provided to students/parents, either via the consent form or the letter of intent.	X	
A signed consent form has been secured from all parents/students, and the consent form meets the requirements of section 11 of the <i>Freedom of Information and Protection of Privacy Regulation</i> .	X	
Consent will be secured from students where they are capable of exercising this right, and guardians (i.e. parents) will consent for students when they are incapable of exercising this right, pursuant to section 3 of the <i>Freedom of Information and Protection of Privacy Regulation</i> .	X	
Students are not obliged to take part in the GAFE program, and alternative measures are provided in all instances where an GAFE interaction is requested of students.	X	
Use		

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

Google Apps for Education PIA

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	
The School District will ensure that the Use Policy is widely distributed and that parents, students, faculty and administration are educated to, and in understanding of the contents of the Use Policy. The Use Policy should be provided with consent forms.	X	
Disclosure Only the names and School Districts of those students who have signed consent forms (or, where applicable, a parent has signed a consent form) will be disclosed to Google for the purposes of the Google Apps for Education Program.	X	
	Yes	No
Access, Accuracy, Correction and Annotation (see section VI of this PIA) The School District has identified a contact person within the School District who is responsible for providing access to, ensuring accuracy and completeness of, and making requested corrections to personal information held within the Google Apps for Education program. Where corrections cannot or will not be made, this contact will annotate the records containing the information. School District contact: ____Ted Pennell, Director of Information Technology____	X	
Security (see section VII of this PIA) The School District has identified a contact person within the School District who is responsible for maintaining the security of the personal information held in the Google Apps for Education system. Greater Victoria School District contact: ____Paul Landry____plandry@sd61.bc.ca____ Saanich School District contact: ____Herman Kolkema____hkolkema@sd63.bc.ca____	X	
Monitoring Student email accounts will only be searched, seized, monitored, suspended, or revoked in accordance with the Use Policy established by the School District. Content of student account will only be searched for one of the following reasons:	X	

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

Google Apps for Education PIA

<ul style="list-style-type: none"> • technical maintenance • in order to meet legal requirements to produce • prevent misconduct/ensure compliance with the law (e.g. the School Act) 		
Records Management A records retention and disposition schedule has been created. All records used to make a decision about an individual will be kept for at least one year.	X	
Scope I understand the information and analysis in this PIA is limited to the interaction between Google Apps for Education and the requirements set out in the FOIPPA. It is the responsibility of our School District to review Google's Terms of Use/General Services Agreement. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to legal review of, and approvals for indemnities created by, Google's Terms of Use/General Services Agreement.	X	
I understand that as the School District's service provider, Google is considered a public body employee under the <i>Freedom of Information and Protection of Privacy Act</i> , and strictly within the scope of offering this service to the School District is thus bound by the same restrictions and requirements.	X	

If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your Google Apps for Education Program can be launched.

School District No. 61 (Greater Victoria)

Checklist Completed By _____ Ted Pennell _____ Signature _____

Name of School District's PIA signor: ____ Mark Walsh _____

Signature: _____ Date _____

School District No. 63 (Saanich)

Checklist Completed By _____ Gregg Ferrie _____ Signature _____

Name of School District's PIA signor: ____ Jason Reid _____

Signature: _____ Date _____