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## PURPOSE

*The purpose of this document is to outline the procedures and guidelines to be used when students, teachers and other school board/authority employees publish material on the Internet using the school board/authority or school website(s). This document focuses on privacy and security issues. School boards/authorities should develop a more complete policy or guideline on the use of websites within their school board/authority in order to make effective use of the technology.*

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## Background

Schools and school boards/authorities need to have policies and procedures which include; what types of information will be posted to the website; who will be responsible for determining the information to be posted; a procedure for obtaining consents and who will be responsible for responding to any complaints that may arise. In addition, schools, and school boards/authorities should post their privacy policies on their websites.

The school board/authority should provide a web-based infrastructure to schools and to teachers to augment learning through the use of the Internet.

Schools have been using print material, such as newsletters, to communicate education-related information to parents/guardians and students. Many schools are using the Internet to disseminate information to parents/guardians, students, and the community at large. The use of the Internet is widespread and as such, challenges people to think about access and privacy in a professional capacity as well as personally. While it offers access to information at an unprecedented level and speed, the Internet can also threaten the privacy of staff and students as never before. It is critical that the school board/authority be aware of these challenges and provide guidelines to its employees in order to maximize the benefits of the Internet and minimize any loss of privacy to staff and students.

All school board/authority programs, schools, and departments are encouraged to contribute relevant content to the school board's/authority's website. The web provides an excellent communication tool to reach the school board's/authority's many audiences. School boards/authorities may maintain more than one website; generally one aimed at the community, students, parents, and vendors; and another internal websites (portal) for content directed to staff. As with any communication tool, it is essential for the school board/authority to project a professional image. It is critical that the school board/authority website is user friendly and easy to navigate, maintaining visual standards, content accuracy, currency and relevancy, and technical accuracy.

As schools are familiar with the Internet and its many uses, they are creating their own school websites, to establish their presence on the web. Websites make information about the school available to the school community as well as to the public worldwide. Such websites are an excellent means to inform viewers about the school. Visitors from around the world will view school websites. It is important that all school websites reflect the board goals, maintaining respect for copyright and intellectual property. To that end, these guidelines are being put in place, to ensure that the information contained on school websites is accurate and appropriate for the school or school board/authority and to protect personal information.



## Definition

A web page can consist of text, pictures, video and/or sounds. Web pages are found on the internet and are displayed on a computer monitor. Web pages can contain any information that is placed onto it by the author. Web pages can be accessed via the internet and thus the world has access to the information. Every web page is identified by a unique web address or URL (Uniform Resource Locator). These can be created using HTML (hypertext markup language), DHTML (Dynamic HTML) and JavaScript and are translated by a Web browser. A web page is an individual HTML document and a website is a collection of pages. The first webpage usually requested at a website is called the “home page.”

## Disclosure of Personal Information

Personal information by the definition provided by the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) is, in essence, “any information about an identifiable individual or rendering an individual identifiable.” An image of students’ work that has their name attached and contains identifying information is an example of personal information. Personal information is subject to the application of certain laws pertaining to its collection, use, and disclosure.

### Notice alone may be sufficient when:

- Collection is for internal use only; when the information remains in the school board’s/authority’s custody.
- Use and or disclosure remains under the school board’s/authority’s control for example when a legal agreement is established such as with external school photographers.
- Disclosure is considered reasonable and expected - fits within the definition of the provision of educational programs, e.g., student displays.

### Signed consent is required when:

- Disclosure takes the information out of the school board’s/authority’s control, e.g, over the Internet.
- The intended use or disclosure is not within the definition of the provision of educational programs and could be viewed as possessing the possibility of breaching an individual’s personal privacy.

### Notice and signed consent should:

- Cite legal authority (e.g., Education Act, Municipal Freedom of Information and Protection of Privacy Act).
- Explain the purpose(s) for the information.
- Provide contact information of an employee responsible for the activity.
- Provide opportunity to opt out of participating.

### Notice:

- Notice and opportunity for signed consent should occur well in advance of the activity. In addition, notice can be posted on the school website.
- There may be occasion when notice of collection is not required (e.g., where the collection is for the purpose of determining eligibility for an award). Each instance must be evaluated on its own merit.



#### Website Publications:

- School administrators must ensure that Internet permission forms are completed before any personal information is posted or published on a school website or the school board/authority website.

#### Use and Disclosure:

- When appropriate collection rules have been satisfied, information can be used and/or disclosed as described in the notice of collection.
- If the use or disclosure changes from that described in the notice of collection a subsequent notice or informed consent must be provided/sought.
- Each individual retains a right of access to their own information with very few exceptions.

#### Retention:

- All web pages and personal information must be retained for a minimum of one year (12 months) from the date of last use unless:
  - as otherwise set out in the school board's/authority's retention schedule or resolution;
  - its regulation requires a longer retention period;
  - the individual to whom the information relates consents to its earlier disposal.

#### Recommendations

- Avoid using images of actual students and staff wherever possible. Use instead:
  - stock images (found on the Internet for example);
  - images of things as opposed to persons (e.g., schools);
  - animation;
  - blurred or distanced images.

#### Reference to Guidelines on Privacy Act Notification Statement



## Personal Information

Schools hold many different types of personal information. Due to the nature of certain types of personal information, some information should never be included on any websites. This would include:

- Student's report card and academic transcript/individual student marks
- Student's Ontario Student Record (OSR)/Ontario Education Number
- Student's telephone number, home address, personal email address
- Parent's telephone number, home address, personal email address
- School and/or school board/authority staff's home address, telephone number, personal email address

Some students may not be concerned about their personal information being posted on the school website, and hence the web, while others are apprehensive. Types of personal information, which school board's/authority's may decide to post, provided the proper consent is obtained, in advance, include:

- Photographs of students (individual and/or group)(with or without a name)
- Students' work (e.g., essays, projects, etc., with or without a name)
- Names of students participating in extracurricular activities and student council
- Names of students award-winners/prize/scholarship winners
- School yearbooks (names and photographs)

Some information may be considered "non-personal" when used alone but, when combined with a second piece of information, becomes personally identifying. A picture or a name on its own may not be considered "personal information," but together will form an identity that can be recognized.

## Information that may be personal information, depending on its content

It should be noted that certain types of information may not appear to be personal information, but depending on the content, may contain personal information.

Examples of types of information, which may contain personal information are:

- School newsletters
- Minutes of meetings, including those of school councils
- Information on school events, such as fundraisers, drama productions, athletic competitions, science fairs

The above records need to be reviewed on a page-by-page basis. If they contain personal information, they should only be posted to the website if the personal information is edited out, or if the individuals to whom the personal information relates have consented to its posting.



## Intranet and Collaborative Spaces

An intranet is a network of computer servers that hold and share information owned by the school board/authority that are accessible only by authorized users. School boards/authorities should develop and publish intranet access and use guidelines, available to staff and/or students internally. Guidelines should outline the purposes, benefits, and risks associated with the use of intranet resources. The school board/authority is responsible for facilitating the setup, maintenance, and monitoring of user accounts to the intranet.

Collaborative spaces (including forums) blogs and wikis may also be available for staff and/or students internally. These collaborative spaces are not intended for finalized school board/authority information. Collaborative spaces are areas for collaboration and may refer (link) to documents on the school board's/authority's official website(s), such as minutes of meetings or calendars for specific initiatives. The school board/authority should provide a means for users to report any inappropriate communication such as attempts to engage students in contact outside of the school.

## Guidelines for School Websites

The principal is responsible for the content of the school website. Any school creating a website should have a webmaster appointed by the principal. The webmaster should assist the principal in ensuring that these guidelines are adhered to and that the content of the school web pages meets the principal's approval.

- For consistency, maintainability, URL management, site security, and other related issues, all organizations of the school board/authority, including schools must host their sites on the school board/authority web server.
- The content of the school website and associated links must be consistent with the educational aims of the school board/authority.
- School web pages should not contain any commercial or promotional advertising. School web pages may contain small acknowledgements of school partnerships or sponsorships, which are in accordance with the written approval of the Director.
- All school websites must contain a link back to the school board/authority home page. This link must be prominent and displayed on the school's main page.
- No school page content should provide the means for people to contact any student directly. If communication back to the school is needed, it should be directed to the appropriate staff member.
- Pictures of students included on school web pages must NOT include student names. Similarly, schools should not use filenames for pages and images which include student names. First names can be used for samples of student work.
- When using pictures of persons on the school website, the school should obtain written permission.
- Personal home pages for students or staff members are not permitted.
- School web pages must not use copyrighted materials without permission.
- The principal must be clearly identified on the main page with the principal's email address prominently displayed. All correspondence to the site should go to the school identified school website contact. Where a teacher has a curriculum project that requires email responses, the principal can authorize the listing of the teacher's email address and not receive copies of the responses.



- The date of the last update must be clearly identified on the main page.
- To encourage currency of school pages, it is recommended that each school web page on the school board/authority site be disabled if the date on the school main page is more than six months old and information is out of date. Schools should be contacted prior to disabling the page.

## Principal's Guidelines for Selecting a School Webmaster

The school webmaster should be a staff member who can facilitate or develop the ability to do the following if required for the school's website (system support will be available):

- Use a web editor
- Create and edit .gif and .jpg pictures
- Create transparent gifs
- Use HTML (basic fluency)
- Use the generally accepted principles of good web page design
- Assess strengths and weaknesses of current web implementation

The school webmaster should:

- In cooperation with the school principal, know and apply the school board's/authority's policy in relation to the school's website.
- Be responsible for ensuring that the school's website is posted to the board's server.
- Ensure the school's website is updated at least every four months or inform the school board's/authority's webmaster that an update is not needed.
- Coordinate the following:
  - Quality control of content and design of the school's website
  - Incorporation of new ideas and technologies into the site as the resources become available
  - Periodic check of links to ensure they are current and still meet the school board's/authority's website guidelines and, if needed, make appropriate changes
  - Identification of website bugs and problems and development of strategies to correct these problems.

## Guidelines for Teacher Websites

A teacher website, under the direction of the principal, should be self-administered.

A teacher website should be directly related to the classroom curriculum.

**Examples of classroom curriculum-related/educational material(s) are:**

- Assignments
- Upcoming events or trips - being careful that posting time and place information may have impact on issues of custody.





## General Information/Personal Information: Individuals' Professional Responsibilities/Professional Capacity

### Reference MFIPPA section 2.1

Information encountered in the course of one's professional capacity or individual professional responsibilities, does not constitute "personal information" as cited in MFIPPA legislation, Section 2.1. Examples of this type of information are:

- Staff lists with staff members' names, titles, contact information, department, and grade taught
- Names of staff members responsible for extracurricular activities
- Names of volunteers/community members/schools
- Photographs of staff members (individual and/or group photos)
- Photographs of volunteers/community members (individual and/or group photos)

Although there are no privacy provisions under MFIPPA legislation that must be considered in this category, other issues may arise. Consent should be obtained from each staff, volunteer, and community member prior to posting their general or personal information on the web.

## Accessibility

The Web is an increasingly important resource in many aspects of life for staff and students. School board/authority and school websites should be accessible in order to provide equal access and equal opportunity to staff and students with disabilities to more actively participate in the school board's/authority's education goals. Web accessibility encompasses all disabilities that affect access to the Web, including visual, auditory, physical, speech, cognitive, and neurological disabilities.

Web accessibility through various technologies offers the possibility of access to information and interaction and to overcome barriers inherent in print, audio, and visual media.

## References

1. The Information and Privacy Commissioner/Ontario, Upper Grand District School Board and Peterborough, Victoria, Northumberland and Clarington Catholic District School Board - *Posting Information on Websites: Best Practices for Schools and School Boards*
2. Grand Erie District School Board - *Web Publishing Guidelines*
3. London District Catholic School Board - *Guideline for School Websites*
4. London District Catholic School Board - *Website Terms of Use*
5. York Region District School Board - *Website Disclosure and MFIPPA*
6. York Region District School Board - *Web Standards*
7. The Dufferin-Peel Catholic District School Board - *Posting Information on the Internet as it Applies to the World Wide Web - By Schools and Teachers AND Consent Forms*
8. Simcoe County District School Board - *Acceptable Use of Tech Guidelines - Draft*
9. Halifax Regional School Board - *Draft Acceptable Use of Computers and Internet/Intranet Technology Policy*
10. Web Accessibility Initiative - "Introduction to Web Accessibility" ([www.w3.org](http://www.w3.org))



## Appendix

**Sample Website Terms of Use**

**Sample Website Privacy Policy**

**Sample Website External Links Disclaimer**

**Sample Website Copyright Protection**

**Consent Forms**

### Sample Website Terms of Use

A website is maintained by a school or school board as a public service to students, parents, staff, and site visitors from the community and beyond. The board cannot guarantee that all information is current or accurate. Website users should verify all information before acting on it. The school board reserves the right to change or modify its terms, conditions, and notices under which use of the website is offered. Continued use of this website constitutes an agreement to all such terms, conditions, and notices. Communications made through this website's email and messaging system should in no way be deemed to constitute legal notice to the school board or any of its agencies, officers, employees, agents, or representatives, with respect to any existing or potential complaint, grievance, claim, or cause of action against the school board or any of its agencies, officers, employees, agents, or representatives.

### Sample Website Privacy Policy

The school board respects the privacy of its Web visitors. Personal information on the Internet is protected in the same way it is protected in all other ways that are communicated and interacted with. Staff should adhere to strict policies that protect the confidentiality of any personal identifiable information such as names, email addresses and telephone numbers. The use of cookies is strictly prohibited except to provide data on a performance measure of meeting informational or service needs relative to the Internet site. The only personal identifying information collected from use of the school board website is from submitting comments, suggestions, or questions through a feedback form or an email. The school board will not sell, rent, or release personal information to third parties.

### Sample Website External Links Disclaimer

There may be websites linked to and from this site that are operated or created by or for outside organizations. Those organizations are solely responsible for the operation and information (including the right to display such information) found on their respective websites. The linking to or from this site does not imply on the part of the school board or any of its employees any endorsement or guarantee of any of the organizations or information (including the right to display such information) found on their respective websites. The school board does not assume and is not responsible for any liability whatsoever for the linking of any of these linked websites, the operation or content (including the right to display such information) of any of the linked websites, nor any of the information, interpretation, comments, or opinions expressed in any of the linked websites. Any comments or inquiries regarding the linked websites are to be directed to the particular organization for whom the website is being operated. The board reserves the right to block access to and from inappropriate Internet domains, email addresses, or websites.



## Sample Website Copyright Protection

Materials on this website were produced and/or compiled by the School Board to provide visitors with direct access to information about the programs and services offered by the School Board. The material on this website is covered by the provisions of the Copyright Act and all applicable federal and provincial statutes. Such provisions serve to identify the information source and, in specific instances, to prohibit reproduction of materials without written permission. Any reproduction or commercial use of the materials is strictly prohibited without written permission of the School Board. To obtain information concerning copyright ownership and restrictions on reproduction of materials on this site, please contact the School Board webmaster.

## Consent Forms

In order to ensure that all staff use board and school websites properly, with respect to posting personal information, they are required to obtain consent from all affected individuals or from a person who is authorized to consent on their behalf.

**This should be a one-time requirement for each school year and for each school. If a staff or student moves to a new school, a new consent form should be obtained. (Note: Such consent must also be reaffirmed if the nature of the posting is different than that generally described in the original consent form.)**

*Informed consent* requires that the person consenting understand the exact nature of the information for which consent is sought, understand the potential consequences of signing the consent form, and be given the right to revoke the consent at any time.

Only persons having lawful custody of the student may sign this consent form as parent or guardian. In cases of joint custody, it is advised that both parents provide consent.

For those situations where an individual whose consent is required is mentally incapable and a substitute decision maker has been appointed under Ontario Law to act on his/her behalf, then the individual appointed as substitute decision maker should sign the consent form.





## CONSENT FORM For Posting Student’s Personal Information On A Teacher’s Website

This consent form meets the requirements of the Municipal Freedom of Information and Protection of Privacy Act and the Education Act for the disclosure of personal information. It provides for consent that is both informed and voluntary, and relates to clearly identified information to be used and disclosed for clearly defined purposes.

By signing this document, I/we consent to the disclosure of personal information about \_\_\_\_\_  
(name of student)

by posting it to the website of \_\_\_\_\_ and hence to the World Wide Web.  
(name of teacher)

This consent only applies to the items below that I/we have initialed:

\_\_\_\_\_ Videotaping/digital video of \_\_\_\_\_ (name of student)  
individually or in a group, participating in the board-approved educational site:  
\_\_\_\_\_ (name of site)

\_\_\_\_\_ Videotaping/digital video of \_\_\_\_\_ (name of student)  
individually or in a group, participating in the board-approved curriculum project:  
\_\_\_\_\_

I/we have read and understood the school board’s policy on school Websites. I/we are aware that by giving this consent, I/we are permitting personal information about \_\_\_\_\_ (name of student) to be posted to the \_\_\_\_\_ (teacher’s website) and hence, to the World Wide Web, and that if consent were withheld, this posting would not occur.

I/We further understand that this consent is valid for one year and may be withdrawn by me/us at any time, upon written notice. In the event that consent is withdrawn, I/we understand that the information about me will be removed from the teacher’s website, but understand that, in some cases, it is impossible to remove all traces of personal information from the Internet.

I/we have given this consent voluntarily: \_\_\_\_\_ on \_\_\_\_\_  
(Date) (Place of signature; e.g., city)

For students under 16 years of age: \_\_\_\_\_  
Signature of Parent/Guardian

For students aged 16 or 17 during the school year – signature of both the student and parent/guardian:

\_\_\_\_\_  
Signature of Student Signature of Parent/Guardian

For students 18 years of age or over – signature of student:

\_\_\_\_\_  
Signature of Student



## CONSENT FORM For Posting Volunteer/Community Member Personal Information On A School's Website

This consent form meets the requirements of the Municipal Freedom of Information and Protection of Privacy Act for the disclosure of personal information. It provides for consent that is both informed and voluntary, and relates to clearly identified information to be used and disclosed for clearly defined purposes.

By signing this document, I consent to the disclosure of personal information about me,

\_\_\_\_\_ (name)

by posting it to the website of \_\_\_\_\_ (name of school)  
and hence to the World Wide Web.

This consent only applies to the items below that I have identified with my initials:

\_\_\_\_\_ My photograph/image alone or in a group

\_\_\_\_\_ Extra-curricular activities I have supervised

\_\_\_\_\_ Projects and/or activities at the school that I have participated in/supervised/organized

\_\_\_\_\_ Profile of my work as a volunteer/community member

\_\_\_\_\_ Other specific activity identified by school (please specify) \_\_\_\_\_

I have read and understood the school board's policy on school websites. I am aware that by giving this consent, I am permitting personal information about me to be posted to the \_\_\_\_\_ (school's website) and hence to the World Wide Web, and that if consent were withheld, this posting would not occur.

I further understand that this consent is valid for one year and may be withdrawn by me at any time, upon written notice. In the event that consent is withdrawn, I understand that the information about me will be removed from the School's Website, but understand that, in some cases, it is impossible to remove all traces of personal information from the Internet.

I have given this consent voluntarily.

\_\_\_\_\_ (Place of signature; e.g., city)

\_\_\_\_\_ (Date)

\_\_\_\_\_ Signature of Volunteer/Community Member

\_\_\_\_\_ Printed Name