



**ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION**

Leading Education's Advocates

Ontario Public School Boards' Association
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Cathy Abraham
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Fred Carter, Senior Technology and Policy Advisor
Information and Privacy Commissioner of Ontario

Dear Mr. Carter:

Thank you for the opportunity to provide input on the draft version of the Digital Privacy Pledge (The Pledge), as created by the office of the Information and Privacy Commissioner of Ontario. The Ontario Public School Boards' Association (OPSBA) and its members greatly appreciated the invitation to discuss the draft that was presented and to consider the discussion questions on which you requested input.

Our recent consultation included the Association's two trustee work groups, the Education Program Work Group and the Policy Development Work group, who have members from school boards across the province, including our Indigenous Trustees' Council and student trustee representation.

We share your concern for the digital privacy and protection of students, as it ties directly with one of our five multi-year strategic priorities – [Advocating for the Whole Child and Student Well-Being](#), and would like to share the following feedback on the areas that you identified in your discussion questions:

Terminology

- We recommend greater clarity regarding who is meant by “involve them” in the pledge; as well as consideration for the age of the students involved.
- Expand on what is meant by “digital environment”, as there is confusion among our members about data use, data storage and by whom this is referring to; provide greater clarity on what is being addressed.

Categories

- While there was general support for the three categories (Empowerment, Protection, and Involvement) it was felt that “education” (potentially a component of the training and support aspects of “Involvement”) was a key area for growth. There is a great deal of confusion and a lack of understanding around this complex area, and it is believed that education is a foundational piece for the others to occur.

Addressing Digital Privacy Concerns

- Our members found that the educational piece was the biggest component for them, and hoped that it would bring much-needed attention to the concerns in the educational setting, while also helping to develop the Transferable Skill of Digital Literacy required under the Ontario Curriculum in which “students understand their rights with respect to personal data and know how to protect their privacy and security and respect the privacy and security of others.”

Support and Challenges

- At a high level, we find that this digital privacy work aligns with the concerns of OPSBA, particularly regarding the whole child and student well-being. There were concerns regarding the great educational needs to get there, and the Association recommends a phased-in approach, as many people are currently not yet at a broad awareness stage.
- The greatest challenges will lie at the operational level, with the implementation of commitments at different boards, as resources vary from board to board.
- It was noted that a voluntary pledge may not get the impact that is needed, without any monitoring or implementation controls, with concerns that this is an area that could have huge potential liability for school boards.
- We recommend acquiring broad input from multiple stakeholders, including Indigenous representatives such as the Chiefs of Ontario, before moving on further implementation of the Digital Privacy Pledge.
- We encourage you to extend your input opportunities to those at the operational levels in school boards as well. Appropriate stakeholder groups to start with would be the Council of Ontario Directors of Education (CODE) and the Ontario Association of School Business Officials (OASBO).

We look forward to participating in further consultation and learning of next steps. Please do not hesitate to reach out directly to our Association.

Sincerely,



Cathy Abraham
President

CC: Stephen Lecce, Minister of Education, Ontario
Nancy Naylor, Deputy Minister, Ministry of Education

Our Association represents English public district school boards and public school authorities across Ontario, which together serve more than 1.3 million public elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA is seen as the expert voice of public education in Ontario and is routinely called on by the provincial government for input and advice on legislation and the impact of government policy directions.