

# Building a Trusted Learning Environment: Understanding the Leadership Practice



The TLE Program is supported by lead partners:



Protecting student data privacy is a critical responsibility for every school system. While it is a multi-stakeholder endeavor, school system executive leadership is needed to drive and support the work.

A core practice area of the CoSN Trusted Learning Environment (TLE) Seal Program addresses executive leadership involvement with, and support for, the school system's student data protection efforts. This guide explains the requirements of the TLE Leadership Practice, to support school system leadership in creating and championing a holistic approach to student data privacy.

## WHY LEADERSHIP MATTERS

Data privacy will not succeed without engagement from superintendents. They are responsible for: establishing student data privacy as a priority for the district, setting the tone for the teams, providing the resources, spearheading development of critical district privacy policies, making the difficult, risk-based decisions, and ensuring that parents and other community stakeholders have the information they need to understand the district's privacy program.

Without those efforts, risks to student data will grow.

The CoSN Trusted Learning Environment Seal Program recognizes and applauds the role of school system leadership, and provides specific action steps for leaders against which to measure their work to build and improve their school system student data privacy program.

**68% of education IT leaders said concerns around privacy and security are more important than they were last year. They can't succeed without the support of superintendents leading and championing a data protection program.**

[CoSN 2019 IT Leadership Survey](#)

*"As school system leaders, one of the most important responsibilities we have is to ensure that our students remain safe while in our care. That means not just protecting their physical safety, but also the information that we maintain about them."*

Dr. Allan Markley, Superintendent  
Raytown C-2 School District (MO)

The TLE program includes 6 fundamental requirements for school system leaders.

Here are the practices:

**KNOWLEDGE** The deliberations and decisions of school system leaders reflect an understanding of data privacy and security.

School system leadership must be actively engaged around student data privacy issues. This first requires knowledge of all applicable federal and state student data privacy regulations, community expectations and what's needed to build and grow the school system's student data privacy program.

Building this knowledge should be an ongoing process that informs managing privacy challenges as the data and technology programs evolve.

Leadership should be discussing student data privacy on a regular basis across a school system's governing board, cabinet or other leadership groups. These discussions should include consideration for school system compliance with the Family Educational Rights and Privacy Act (FERPA), the Protection of Pupil Rights Amendment (PPRA), the Children's Internet Protection Act (CIPA), the Children's Online Privacy Protection Act (COPPA), privacy provisions of other applicable federal laws, such as Individuals with Disabilities Education Act (IDEA), the National School Lunch Act (NSLA) and more, as well as state student data privacy laws, existing district privacy policies and security practices.

Conversations should include aligning and updating district policies with regulatory requirements, assessing how schools are meeting the policy requirements, existing risk mitigation plans, pressing issues that may have implications for legal compliance and more.

**COMPLIANCE** The school system has up to date policies and regulations addressing data privacy compliance requirements.

Leadership is responsible for developing policies that establish requirements for compliance with all applicable federal and state regulations and school system rules.

A policy is not a restatement of the law, but a set of guiding principles. While it may address specific requirements of a law, it is customized to the school system. Each policy should be accompanied by a procedure that explains how people are to behave in order to accomplish the policy objectives.

# THE LEADERSHIP PRACTICES

**SETTING EXPECTATIONS** The school system's policies and regulations set clear expectations for the protection of student data privacy and security, as well as the transparent use of data.

Creating a holistic data governance program is not just about protection and restriction. In fact, it should start with what can be done with data – ethically, effectively and safely – to benefit students. Leadership needs to establish expectations for data use, and ensure that those expectations, and the boundaries around them, are made clear to all employees and community stakeholders.

To properly protect student data, leadership also needs to establish what employees are expected to do in order to keep data private and secure. Procedures should include step-by-step explanations of how to act to meet the requirements of a specific policy addressing data protection.

In addition, leadership should make clear to employees the minimal requirements for communicating to parents about why student data is collected, how it is used, shared and protected.

**DESIGNATED LEAD** A school system executive leader is identified as the person responsible for development and implementation of data privacy and security policies and practices.

Everyone has a role to play in protecting student data privacy, and school systems should appoint an executive leader to ensure development and implantation of the data privacy and security policies and practices. This role is often given to a chief technology officer, IT director or other technology leader. Leadership must ensure that the individual has the proper qualifications, knowledge of both privacy and security requirements, and the resources to further develop their education and skills in these areas.

This individual must also be empowered, reporting at the executive level of the school system, and provided with ready access to the superintendent and other cabinet-level leaders. This ensures ease of communication, proper ownership of data protection risk at the superintendent level, and authority to engage individuals across different teams within the school system to implement procedures to protect student data privacy.

*“Superintendents play a critical role in setting the need for an effective student data privacy program and ensuring that protecting student data privacy remains an ongoing priority for the entire school system.”*

Dr. Rob Anderson, Superintendent  
Boulder Valley School District (CO)

# THE LEADERSHIP PRACTICES

**TRANSPARENCY** School system leaders provide transparent, updated and accessible communications regarding the collection, management and use of student data to their community.

Trust is built through transparency, and school system leaders must communicate clearly with community members about the data collection and protection programs. Parents need to be informed about what data the school system is collecting, how it's being used and shared, how that use benefits their child, and how it remains protected. Parents should also be informed about their role in protecting student data privacy, and what they and their children can do to help.

**RESOURCES** School system leaders ensure adequate resources are available to meet data privacy and security needs.

Protecting student data privacy requires funding. Whether it's money for a full-time employee to oversee data privacy or security work, spending on security infrastructure, support for policy development work, travel to conferences or other education opportunities, or legal fees, protecting student data privacy requires several line items on the budget. Leadership is responsible for understanding the costs, maintaining an annual budget adequate to meet the needs, and establishing the process through which funding may be requested as needs arise.

## THE ROLE OF LEADERSHIP ACROSS OTHER TLE PRACTICE REQUIREMENTS

Protecting student data privacy starts with leadership, but the work cuts across all facets of school system organization. The TLE program reflects that by including requirements for Data Security, Business Practices, Professional Development and Classroom Practices.

However, it is leadership that makes the decision to prioritize student data privacy and establishes that priority across the organization.

Whether it's providing support to establish a technology review program, providing the resources to craft an appropriate and accurate data protection agreement, investing in privacy training or requiring certain privacy practices to be embedded in curriculum materials, leadership is at the forefront of all privacy work across a school system.

## GETTING STARTED

School system leaders set expectations for protecting student data, even as they grow their knowledge base. A variety of resources are available from CoSN and AASA to support those efforts.

# ADDITIONAL RESOURCES

## CoSN'S EMPOWERED SUPERINTENDENT INITIATIVE:

[\*Student Data Privacy: A School System Priority\*](#) An Essential Commitment. 5 critical guidelines for ensuring data privacy in your use of technology.

[\*Trusted Learning Environment: The Role of Leadership in Protecting Student Data Privacy\*](#) An overview of the CoSN Trusted Learning Environment Program.

[\*The Importance of Cybersecurity\*](#) 5 critical reasons why district tech leaders must make cybersecurity a priority.

## CoSN's PRIVACY INITIATIVE:

[\*Student Data Principles\*](#) 10 principles for protecting and guiding the use of the personal information of America's students, created by CoSN and the Data Quality Campaign (DQC), along with 32 education organizations.

[\*CoSN Protecting Privacy in Connected Learning Toolkit\*](#) An in-depth guide to federal and state student data privacy laws, including guidance on how key laws operate together, suggested contract terms, explanations of meta data and de-identification, use of click-wrap agreements and more.

## AASA:

[\*AASA Student Data & Privacy\*](#) An overview of AASA positions and recommendations on key student data privacy regulations.

[\*AASA Principles for School Safety, Privacy, & Equity\*](#) 10 principles focused on protecting all students' privacy and dignity, as well as their right to an equal education, endorsed by 40 education and privacy organizations.

# About the Trusted Learning Environment Seal Program:

The [TLE Seal](#) is the nation's only data privacy seal for school systems, focused on building a culture of trust and transparency. The Trusted Learning Environment (TLE) Seal Program was developed by CoSN (the Consortium for School Networking), in collaboration with a diverse group of 28 school system leaders nationwide and with support from AASA, The School Superintendents Association, the Association of School Business Officials International (ASBO) and ASCD.

The Program requires school systems to have implemented high standards for student data privacy protections around five core practice areas: Leadership, Business, Data Security, Professional Development and Classroom. School systems that meet the Program requirements will earn the TLE Seal, signifying their commitment to student data privacy to their community.

TLE Seal recipients commit to high standards and continuous examination and advancement of their privacy practices.

## About CoSN:

[The Consortium for School Networking \(CoSN\)](#), the national association of school system technology leaders, believes that technology is an essential component of learning today, and is deeply committed to the use and distribution of technology in school systems. However, all technologies must be properly assessed for design and appropriateness in the modern classroom. Educators and companies alike must recognize and uphold their responsibilities to protect the privacy of student data.

Working together, educators and the private sector serve millions of students by providing them with the rich digital learning experiences and access needed to succeed in college, work and life. That partnership is critical to ensuring that students will have the tools necessary for success in the 21st century.

## About AASA:

[AASA, The School Superintendents Association](#), founded in 1865, is the professional organization for more than 13,000 educational leaders in the United States and throughout the world. AASA's mission is to support and develop effective school system leaders who are dedicated to equitable access for all students to the highest quality public education.

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