

## Student Data Privacy: Privacy Practices in Action – Deep Dive

## **Getting Started with Privacy Leadership**

District superintendents and the board are ultimately responsible for the data privacy and security practices of the district, while the technology team is typically leading development and implementation of privacy and security programs.

Here are 10 steps to consider as foundational to building a privacy program:

- Get Educated. Immerse yourself in what privacy is and what the laws require. Read the laws, read your district policies, check out the resources below, and more.
- 2. Begin at the Beginning. Review district privacy-related policies and procedures, and note what needs to be updated. Leverage CoSN's "Trusted Learning from the Ground Up: Fundamental Data Governance Policies and Procedures" to help identify what may be missing. Take the CoSN Trusted Learning Environment Self-Assessment to quickly identify some strengths and areas for improvement.

## This resource is fundamental to being able to meet the requirements of the TLE Leadership Practice

The first leadership practice requires that the deliberations and decisions of school system leaders at the governing board level reflect an understanding of data privacy and security. In order to get there, you must first have a deep understanding of data privacy and security to build the foundation for a functioning privacy program. This resource is designed to help you get there.

- 3. **Consider the "How."** Consider *how* you will develop and implement privacy and security programs, and what you need from others to be successful. Get specific about what supports you may need.
- 4. **Make it a Team Sport**. Consider *who* can help you make the work happen. Identify leaders in different department who would be part of a team working together on privacy decisions.
- 5. **Set Meeting Goals**. Develop a charter for your privacy team. Work together to identify the purposes and objectives of the group and set a schedule for meetings.
- 6. **Start With Another Self-Assessment.** Ask all members of your new committee to take the <u>CoSN</u>
  <u>Trusted Learning Environment Self-Assessment</u> and compare results. Where is there alignment? What needs additional discussion?
- 7. **Prioritize**. Assess the size and likelihood of experiencing potential risks associated each gap. What can you address easily, and what will take a larger investment of resources? Identify specific goals for the year. If you can, build that into a 3-5 year strategic plan for privacy.
- 8. **Identify Needs for the Year**. What do you need to accomplish the goals? Break each project into manageable action steps with timelines associated with each.
- 9. **Make Your Case.** Put together everything you've learned to date and make the case to leadership. Include clear and specific asks of your superintendent, if needed.
- 10. **Take it One Step at a Time.** Celebrate your accomplishments, and continue to educate yourself and your team on privacy requirements. Then keep going.

## Additional Resources:

Learn more about student data privacy with these free resources:

- US Department of Education Privacy Technical Assistance Center
  - Family Educational Rights and Privacy Act (FERPA)
  - Protection of Pupil Rights Amendment (PPRA)
  - o <u>Training</u>
  - Issued Letters
- CoSN Student Data Privacy Toolkit Parts 1-3