



**Office of the Victorian
Information Commissioner**

Investigations &
Assurance

Examination into the use
of apps and web-based
learning tools in
Victorian government
primary schools

Objectives



To provide a snapshot of how digital learning tools may be used in Victorian government primary schools.



To identify how children's privacy was considered when those tools were chosen and implemented; and



To identify some high level findings and provide considerations for improved practice to support DET, schools, and parents and carers (and children!)

The Examination

We met with:

- ❖ The Victorian Department of Education (DET), including:
 - DET privacy team
- ❖ Four primary schools



At each school visit we met with the Principal and/or Deputy Principal and at least two staff members from Prep to Year 6

We discussed:



What apps and web-based learning tools are being used in Victorian primary schools



How apps and web-based learning tools are selected for use



How parents and carers are informed about the use of apps and web-based learning tools



What support is provided to schools in selecting and using such tools in the classroom

Findings



Schools implement and use a **vast** array of apps and web-based learning tools across all facets of school governance, from curriculum to pupil management.



Schools have **autonomy** to select the tools required to deliver the curriculum, and to meet expected school governance, and the **responsibility** for assessing privacy risks and **informing** parents and carers about those tools used.



The Department has accurate, clear, and concise resources **available** for schools with respect to privacy and data protection, **recognised** the **importance** of privacy in digital learning, and showed a **genuine desire** to protect children's privacy while continuing to deliver quality education.

What we concluded

- ❖ Schools are at risk of breaching the Information Privacy Principles (IPPs)
- ❖ Schools were unaware of, confused about, or had difficulty accessing, resources and directions from DET.
- ❖ Parents and carers are likely to assume that privacy, and any implications for privacy, have been considered before the tool is rolled out.
- ❖ (what we know)
 - Teachers are extremely busy
 - The Department is extremely busy

Issues for consideration

OVIC made the following suggestions for DET's consideration:

- ❖ DET provide additional support to schools by increasing the number of pre-populated PIAs or have greater involvement in the PIA process with schools
- ❖ DET expand the number of parent information notices and opt-out forms provided to schools and consider alternative ways to provide further assistance to schools to inform parents and carers
- ❖ DET review the level of privacy support provided to schools with a suggestion that increasing the level of support will reduce the risk of breaches of the IPPs by schools

Key take outs



The importance of good privacy governance and the need for a **pragmatic** and **thorough** approach to privacy (and risk).



That agencies are struggling to stay across and on top of technology they are required to use, or more specifically, are **reliant** on.



Proactive risk management is (still) in its infancy – be careful not to manage privacy risks by exception (when, or if, an incident occurs) rather than the rule (or rather, by design).



It's not one agency's or person's responsibility.

Questions?

Contact: Investigations@ovic.vic.gov.au

