

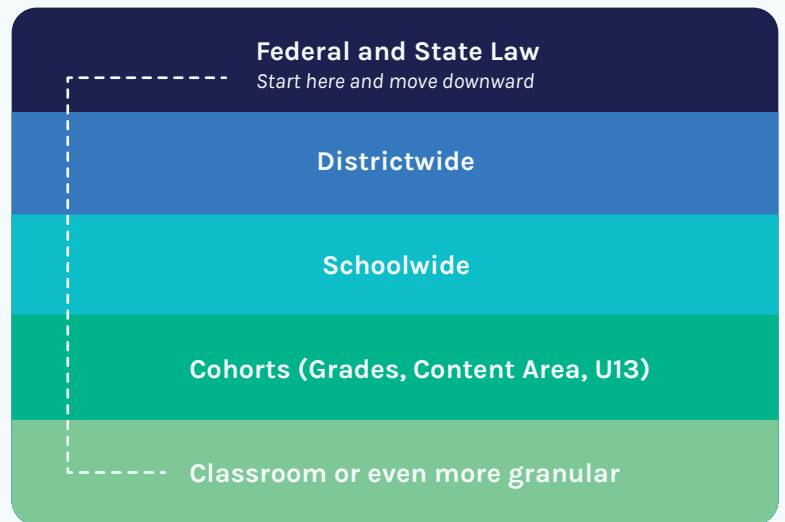
# How to use the Common Sense Privacy Project Privacy Evaluation Questions to create your External Vendor Data Privacy Policy

This document is intended to aid districts with establishing or updating their privacy policy for external vendors using a subset of Common Sense Privacy Project’s (CSPP) core question set. The full question set contains over one hundred fifty questions related to privacy and data security, and CSPP uses it for their [privacy evaluations](#). The subset includes 34 questions identified by a consortia of over 250 school districts as those that were most important. Your policy does not need to reflect all 34 questions.

## 1 | HOW TO DETERMINE YOUR DISTRICT’S DATA PRIVACY POLICY

Gather a team to review and determine the district’s stance on each of the [34 questions](#). This team should be small and often includes personnel like the IT director, curriculum director, and/or technology integrator.

Each question describes something a vendor may do or disclose in its privacy policy. Some questions are phrased as “Yes” and “No” and others will result in a more qualitative answer. Answers to some questions may not impact your district’s decision on a product’s use. You can skip over them. For those where an answer would be problematic for your district under certain contexts, your goal is to find that context to create your district’s policy on that issue. For example, item 10.2.1 is:



### **DISCLOSES TRADITIONAL ADVERTISEMENTS ARE DISPLAYED TO USERS.”**

At issue for this item are tools that would answer “Yes”. Many free tools display advertisements, and your group agrees that displaying advertisements is inappropriate in some contexts. By beginning at the broadest (federal law) you can work toward the most granular to find where you agree is the district’s “line in the sand”. Some districts might draw their line in the sand at the elementary school building, so their policy becomes “Elementary schools may not use tools that display advertisements”. Depending on the topic, there are many different natural places for lines including buildings, grade spans, students above and below age 13, etc.”

By reviewing all 34 questions, districts can define their data privacy policy statements for what it allows or does not allow in the digital tools it elects to use. The CSPP has evaluated over 750 of the most popular digital and online tools already which makes it easier for districts to determine if a tool meets its policy.

## 2 | HOW TO EVALUATE A TOOL AGAINST YOUR PRIVACY POLICY

Example policy statement: Elementary schools may not use tools that display advertisements

- Search the [CSPP evaluations](#) for the tool in question and click on the evaluation to see the details.
- Scroll to the bottom of the page and Click the Read The Report button under the header “Common Sense Standard Privacy Report (SPR)”
- Scroll down through to find the appropriate question. In our example, the question “**Discloses traditional advertisements are displayed to users.**” is question 10.2.1. You will see one of 4 responses in the evaluation:

### Common Sense Standard Privacy Report (SPR)

The standard privacy report (SPR) displays all the privacy practices from a product’s policies in a single, easy-to-read outline. The report shows a green check mark for better privacy practices and an orange alert for risky or unclear practices. This alert indicates that more time should be focused on these particular details prior to use.

[Learn more about the SPR](#)

[Read the report](#)



The green check means that evaluators deemed the privacy policy practice of this tool to follow good industry standard practice for privacy.



The orange warning sign means that evaluators determined that the practice may be of concern. Read the description and you should be able to determine whether or not the practice is of concern to your context.



The white flag means the evaluators did not evaluate that question. The 34 questions you used to determine your policy should all be evaluated.



The bullet will precede an informational note from the evaluators.

## 10: Advertising

### 10.1: VENDOR COMMUNICATIONS

- ✓ A use can receive service or administrative-related communications from the vendor.

### 10.2: TRADITIONAL ADVERTISING

- ⚠ Traditional or contextual advertisements are displayed.

In this example, the warning notes that traditional advertising is displayed. Since your policy is that elementary schools may not use tools that display ads, this tool would not be approved for use.