

Privacy and Security Guidance for Instructors using Online Homework Systems

Instructors must follow the guidance outlined in the *Figure 1: Guidance Table* below when using online homework systems for marks or recommending optional use.

Figure 1: Guidance Table

The following guidance must be followed by instructors when using marks from online homework systems and offering a reasonably equivalent alternative, or recommending optional use:

- Clearly state as early as possible in the term to students that either:
 - a. the students may either use the online homework system, the results of which will be used to determine a portion of the students' grades for the course, or the students may use the reasonably equivalent alternative; or
 - b. the recommended online homework system is optional and will not be used to determine any portion of the grade for the course.
- Make students aware that their registration and any monetary transactions with the recommended online homework system is on their own accord and the University is not responsible for the content of the third-party service or for any injury or damage arising from its use.
- Protect the identity and privacy of your students when using external third parties. See *Figure 2: De-identifying Examples* for examples of how some instructors have been de-identifying the student record when using online homework system providers for marks.
- Recommend to students to be mindful of what personal information the third-party provider is collecting from them, how their personal information will be used, and whether it will be shared with others.
- Recommend to students who have concerns about the use of their personal information by the third party provider, to register using a non-identifying email address or account (as often only a valid and active email address is required to register with the third-party provider).
- Instructors must investigate and research the third-party provider to understand what is required and what the implications are to register and use their services. Recommending a third party provider that does not handle students' information in a responsible manner can reflect poorly on the University. The findings should factor into the instructor's consideration as to what third-party provider(s) to recommend to their students. In addition, the instructor must inform students about the registration and use requirements of the third-party provider(s).

- Specifically, instructors should review the privacy policy of any third-party provider to make themselves aware of how the third-party provider will use and disclose the students' personal information. To whom will the third-party provider disclose the students' personal information, and for what purpose? How may the third-party provider use the students' information?

An example of appropriate wording in a provider's privacy policy is as follows:

We may use de-identified location, age, gender, and usage data in research studies intended to improve our understanding of how people use our website.

We may disclose certain of the information we collect to third-party service providers that help us manage communications to and from the website and improve website performance. We are satisfied that these service providers have privacy policies that restrict them from further disclosing any of your information.

Other than as described above, we will never share personally identifiable information about you with any other person, company, or organization, except:

- As required to comply with our obligations under the law.
- For technical reasons, if we are required to transfer the data on our servers to another location or organization.

An example of inappropriate wording in a provider's privacy policy is as follows:

We also may share your personal information with societies, sponsors and other non-affiliated third parties that wish to send you information about their products and services that may be of interest to you.

Figure 2: De-identifying Examples

Example 1: Generating a random number for the student to use in registering with the online vendor.

Detailed instructions can be found [here](#).

Example 2: Using the student's CCID where it is non-descript and non-identifying

Step #	Nondescript and Non-identifying Student CCID
1	Suggest to your students with nondescript and non-identifying CCID's (eg. xxy11) that they can use their CCID to register with online providers (still following the best practice of using a non-identifying email address).
2	For students who do not want to use their CCID or who have identifying CCID's such as gordie (Gordie Mah's) or dalguire (Diane Alguire's), then a random number can be generated through example 1 above.
3	Remind students not to use their email/CCID alias such as mike.macgregor because it is fully identifying.

Questions and concerns can be directed to the Office of the Vice-Provost (Information Systems and Technology) at vpit@ualberta.ca and the Information and Privacy Office at foipp@ualberta.ca.