

Privacy Guidance for Instructors

Learning Tools Interoperability (“LTI”) integration into Learning Management System

1. **Review Class Settings** (if applicable): Review any class settings and permissions around privacy and security. Instructors may configure privacy settings, such as controlling whether students’ annotations are visible to other students, the ability to post anonymously, etc. Options will differ for different LTIs. Please consult with the Privacy Office as needed (privacy.office@uwo.ca).
2. **Role-Based Access Controls:** Implement role-based access controls to restrict access to personal information based on user roles and permissions. Ensure that only authorized individuals who *need* the information for the performance of their duties have access to any personal information.
3. **No E-Commerce:** No e-commerce should occur with the provider. All purchase of textbooks should be made through the bookstore.
4. **Disclose use of LTI:** please indicate the LTIs that you will use in your syllabi, which could also be a means to communicate the messaging in these guidelines to your students. This notice should include what information it will collect and how the information will be used. If the LTI tracks information such as reading completion and habits, this must be disclosed to your students.
5. **Minimize Data:** limit the collection of personal information to only what is necessary for the functioning of the LTI integration. Most often, this is name and e-mail address only. Do not collect excessive or irrelevant information.
6. **No personal or sensitive information:** do not give assignments or tasks that involve students inputting any personal or sensitive information within the integration. If the use of personal and/or sensitive information is required for a student assignment or task, consider submitting it outside the integration (i.e. exclusively through Brightspace, directly to an instructor email, submitting a physical copy, etc.). If using any form of automated grading, the assignment should not have personal or sensitive information.
7. **Data Retention:** determine how long student’s personal information will be retained within the LTI integration, with the understanding that minimizing data retention periods helps reduce the risk and scope of unauthorized access and data breaches. The retention cycle should be in line with a student’s right to appeal academic matters. Otherwise, there is a legal requirement to retain personal information for at least one year from its last use.
8. **Deletion:** delete student information from the LTI once the retention cycle you have established is complete.

Please note: “Personal information” is recorded information about an identifiable individual and includes information such as names, views and opinions of that person, email address, home addresses, social media, images, etc.

9. Items to communicate to your students (syllabi/course outline):

- a. Although students may be prompted to provide additional information, they should not offer any additional personal information than what is truly required. Avoid filling out optional profile fields that request sensitive information, such as your home address, phone number, or date of birth.
- b. If the integration has interactive features (ability to post comments, boards, posts, etc.), you should advise them not to include any personal or sensitive information.
- c. Students should not create a separate log in/profile with the provider and should instead remain in the Brightspace environment through the integration. If they decide to create a full profile, they should review the provider's privacy policy and terms and conditions and avoid linking their social media accounts which may allow for further collection, uses and disclosures of personal information. If they decide to create profiles on the providers' websites, they are proceeding at their own risk.
- d. Advise students that instructors may use some of the content available on the LTI to determine a student's final grade and identify which assignments or quizzes this will apply to.
- e. Information such as your usage and results of assessments will be shared with the instructors and other authorized individuals.