



## COMMERCIAL TOWNSHIP SCHOOL DISTRICT

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*Kristin Schell*  
Superintendent/Principal

*John Lavell*  
Supervisor of CTS/Special Services

*Darren Harris*  
Business Administrator

*Alysia Thomson*  
Assistant Principal

November 4, 2021

Dear School Families:

At the beginning of the school year, information regarding acceptable use of District technology was provided to students and parents/guardians. This information is to supplement the information already shared.

To help keep your child safer and more scholarly online, Commercial Township School has adopted online services provided by GoGuardian. It may be helpful to know that over 10,000 other schools use GoGuardian to protect 5.5 million students across the world, and the [Global Educator Institute](#) has endorsed the GoGuardian Teacher product.

### **How are we using GoGuardian?**

We have chosen services to:

- Help protect students against harmful and inappropriate online material
- Help students stay “scholarly” and more focused when learning online
- Help assess students’ progress towards class assignments
- Facilitating communication between teachers and students during class time

### **When and how does GoGuardian operate?**

GoGuardian’s web-based services operate on our school’s managed G Suite for Education Chrome accounts (i.e. when students are logged into Chrome or a Chromebook with their school email address). GoGuardian services operate when students use their District-issued Chromebook at home and when students use Chromebooks at school. Any time students are logged into Chrome or a Chromebook with their Commercial Township School login credentials/e-mail address, GoGuardian services are operating. GoGuardian administrative settings help protect your student during any time your student is logged into Chrome or a Chromebook using their school email. GoGuardian teacher settings operate on days when school is in session and during school hours.

### **What are the school’s responsibilities?**

Commercial Township School selected GoGuardian services to help our students stay safer and more scholarly online. We work with students during class time to help teach them digital responsibility and safety. Additionally, we train teachers about how to operate GoGuardian and about our policies and procedures to help protect student privacy.

### **What are my parental/guardian and child’s responsibilities?**

*Home of the Panthers*



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We ask that students use their school-managed Google accounts and school-managed devices for educational purposes within the boundaries of Policy #7523 - *School District Provided Technology Devices for Students*.

When a student is off campus, parents are responsible for supervising internet access and usage. We encourage you to discuss rules for appropriate internet usage with your student, and to reinforce lessons of digital citizenship and safety with your student. We also highly encourage you to report any potential cyberbullying or other sensitive issues to us.

### **How does GoGuardian help protect my child's privacy?**

To help your student remain scholarly and safe online, GoGuardian collects certain personally identifiable information about your student. GoGuardian has consulted with privacy experts, participates in privacy organizations, is a proud signatory of the [Student Privacy Pledge](#), and has been awarded certifications by [iKeepSafe](#) for complying with the Family Education Rights and Privacy Act. For more detailed information about GoGuardian, you may visit GoGuardian's [website](#), [Trust & Privacy Center](#), GoGuardian's [Product Privacy Policy](#), and the attached COPPA Notice and Disclosure Form.

As always, please reach out to me directly with any questions that you may have.

Sincerely,

Kristin Schell

Enclosures (2):

CTSD Policy # 7523

Children's Online Privacy Protection Act

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### 7523 SCHOOL DISTRICT PROVIDED TECHNOLOGY DEVICES TO STUDENTS

The Board of Education may provide technology devices to students in the district for school district authorized use only. The purpose of this Policy is to establish general guidelines for the issuance and utilization of any school district technology device provided to students of this district. For the purposes of this Policy, "technology device" or "device" shall include, but not be limited to, portable devices such as computers, laptops, tablets, cellular telephones, or any other computing or electronic devices the school district provides to students to be used as part of their educational program.

A technology device made available to students will not be considered a textbook or supply, as defined in N.J.S.A. 18A:34-1, mandatory to a successful completion of the classroom curriculum. Therefore, because a technology device defined in this Policy is not mandatory to a successful completion of a student's classroom curriculum, a student will not be required to obtain a technology device provided by the school district as defined in this Policy. In the event the school district provides a technology device that is deemed mandatory to a successful completion of the classroom curriculum, the district will provide students with such a technology device consistent with its textbook or supply policies. Nothing in this Policy prohibits a student from using their personal technology device in accordance with school rules and regulations.

A technology device provided by the school district may include pre-loaded software. A student is prevented from downloading additional software onto the technology device or tampering with software installed on the technology device. Only school district authorized staff members may load or download software onto a school district provided technology device.

To receive a school district provided technology device, the parent and student must sign a School District Provided Technology Device Form requiring the parent and the student to comply with certain provisions. These provisions may include, but are not limited to:

1. A school district provided technology device must be used only by the student for school district authorized use;
2. A student shall comply with the school district's acceptable use of technology policies, which shall be attached to the School District Provided Technology Device Form, in their use of any school district provided technology device;
3. Any school district provided technology device loaned to a student must be returned to the school district in the condition it was initially provided to the student considering reasonable use and care by the student;



## School District Provided Technology Devices to Students

12. Any other provisions the Superintendent of Schools determines should be included on the School District Provided Technology Device Form.
13. Other - \_\_\_\_\_  
\_\_\_\_\_
14. Other - \_\_\_\_\_  
\_\_\_\_\_
15. Other - \_\_\_\_\_  
\_\_\_\_\_

The school district will provide the student and parent with written or electronic notification that the technology device provided by the school district may record or collect information on the student's activity or the student's use of the technology device if the device is equipped with a camera, global positioning system, or other feature capable of recording or collecting information on the student's activity or use of the device. This notification shall also include a statement that the school district shall not use any of the capabilities in a manner that would violate the privacy rights of the student or any individual residing with the student. The parent shall be required to acknowledge receipt of this notification and the parent acknowledgement shall be retained by the Principal or designee for as long as the student retains the use of the school district provided technology device. The parent acknowledgement and a signed School District Provided Technology Device Form shall be required before the issuance of a technology device to a student. In accordance with the provisions of P.L. 2013, Chapter 44, a school district failing to provide this notification shall be subject to a fine of \$250 per student, per incident. The fine shall be remitted to the New Jersey Department of Education, and shall be deposited in a fund that shall be used to provide laptop or other portable computer equipment to at-risk students as defined in N.J.S.A. 18A:7F-45.

Students shall comply with all school district policies for the use of a school district provided technology device. A student shall be subject to consequences in the event the student violates any school district policy, including the district's acceptable use policies; student code of conduct; any provision of this Policy; or any provision of the School District Provided Technology Device Form.

N.J.S.A. 18A:34-1

P.L. 2013, Chapter 44 – "The Anti-Big Brother Act"

Adopted:





## Children's Online Privacy Protection Act Pear Deck and GoGuardian



### **GoGuardian and Pear Deck Children's Online Privacy Protection Act (COPPA) Disclosure & Consent Form Regarding Personal Student Information** Last Updated: 3/31/21

Because your School is utilizing GoGuardian Offerings and/or Pear Deck software, GoGuardian and Pear Deck are providing your School with information about how we collect and use the personally identifiable information of students under thirteen (13) years of age, as set forth in the Children's Online Privacy Protection Act ("Disclosure"). We are sending this Disclosure to you as an official authorized to act on behalf of your School. GoGuardian and Pear Deck will not knowingly collect, use, or disclose any Personal Student Information without a School's verifiable consent or in accordance with applicable school policy. GoGuardian's Product Privacy Policy ("GoGuardian Product Privacy Policy") and Pear Deck's Product Privacy Policy (Pear Deck Privacy Policy") provide more details about our data practices. If there is a conflict between the GoGuardian Product Privacy Policy or Pear Deck Privacy Policy, incorporated herein, and this Disclosure, the terms of this Disclosure shall take precedence. Capitalized Terms not defined herein shall be ascribed the same meaning as in GoGuardian's Product Privacy Policy or End User License Agreement / Terms of Service ("EULA").

#### **Collection of Personal Student Information**

GoGuardian and/or Pear Deck may collect Personal Student Information when a user is logged onto your school-managed accounts and devices provided by your School, a parent/guardian, or a student for your School's educational purposes. More specifically, GoGuardian and Pear Deck collect the following Personal Student Information:

##### GoGuardian

- **Student's School-Managed Account Information and Association Information:** GoGuardian Offerings collect a student's Google or Microsoft school-managed account information (depending on your School's setup): student's name, email address, Google Profile ID and Google Image URL (for school-managed Google accounts), Microsoft Profile ID (for school-managed Microsoft accounts), and organizational unit, as well as identifiers and association information necessary to associate a student with a certain device, account, settings, school classroom, and/or parents/guardians.
- **Activity Information:** Depending on a School's currently selected GoGuardian Offerings, features, integrations, and settings, GoGuardian may collect additional information about online GoGuardian may collect additional information about online account or activity, including chats (within GoGuardian Teacher), video conferencing recordings (including audio and videos of participating Students and chats including in a video conference) (within GoGuardian Teacher) a student's browsing history, IP address, online content, snapshots, and key percentage variance (but not the actual inputs or sequence of inputs to identify patterns like gaming) collected when the user is logged on to the school-managed device or account.
- **Note About Student-Generated Content:** GoGuardian Offerings generally do not access or store student-generated content. However, students may at times create or store some student generated content through GoGuardian Teacher and other GoGuardian Offerings may access and store student-generated content relevant to GoGuardian Offerings' alert, smart filtering, or similar functionality.

- **Location Information:** Using GoGuardian Admin, a School can collect the geographic location of devices for the purpose of locating and recovering its devices.
- **Integration Information:** If your School chooses to integrate GoGuardian with other Integration Offerings (e.g., integrate with other School software with GoGuardian Offerings), then we will collect the information necessary to integrate and perform our Offerings, including unique identifiers (e.g., Google classroom identifier to connect a student to his/her classroom if your School integrates Google Classroom with GoGuardian Teacher) and other information (e.g., Parent/Guardian Information if your School integrates GoGuardian Offerings with the Parent/Guardian Information from Classlink).
- **Grade and Attendance Information:** Depending on a School's currently selected GoGuardian Offerings, features, selected Integrations Offerings, and settings, GoGuardian may receive grade and attendance information from a School such as grades on a particular classroom assignment and attendance to a class.
- Please note that the information collected may change if your School starts utilizing new features and GoGuardian Offerings.

#### Pear Deck

- **Student's School-Managed Account Information and Association Information:** For students who log into Pear Deck with a SchoolManaged Account, we collect student's name, email address, the school-managed account ID (for example the Google ID or Microsoft ID), as well as identifiers and associated information necessary to associate a student with a certain device, account, presentation, teacher, and/or school. When a student joins a session with a code, we do not collect student name or email address to join such session.
- **Activity Information:** We collect additional information about the student's activity within a presentation, including engagement with and any student content generated in the session. This may include, free text, multiple choice answers, drawings, or URLs.
- **Device and Usage Information:** We collect general device and usage information such as IP address, device identifier, operating system, browser type, non-precise geographic location (e.g. zip code and city), technical information about your device, system and app software, and peripherals, and date and time stamps associated with login.

#### Use of Personal Student Information

GoGuardian and Pear Deck may:

- use Personal Student Information to provide and improve our Offerings and for legitimate educational purposes, including, allowing students to access our Offerings restricting access to allowing students to access our Offerings, restricting access to certain websites, alerting schools to online content viewed by students, as well as enabling teachers to distribute educational material, view student activity, and exchange messages with their students. GoGuardian may use Personal Student Information such as browsing information, device identifiers, cookies, or IP addresses to improve and understand usage of GoGuardian Offerings and/or Pear Deck software.
- use, transfer, and disclose non-personal information (information that does not, on its own, permit direct association with students' identities) for any lawful purpose. For example, we may aggregate and use information regarding usage of GoGuardian Offerings and/or Pear Deck software to help us understand which parts of our Offerings that are of most interest to schools. Aggregated data is considered non-personal information.

GoGuardian and Pear Deck may not:

- sell Personal Student Information
- use Personal Student Information to target advertisements or market to students or anyone else, to amass a profile about a K12 educational student for a non-educational purpose, or for any purposes prohibited by the Family Educational and Privacy Rights Act (20 U.S.C. § 1232g; 34 CFR Part 99.3) ("FERPA"), applicable state law

including California Business & Professions Code section 22584 (“SOPIPA”), and California Education Code section 49073.1.

Lastly, as a company committed to student privacy, GoGuardian and Pear Deck have also signed the 2020 Student Privacy Pledge.

### **Disclosure of Personal Student Information to Third Parties**

Depending on your School’s selection of GoGuardian Offerings and Pear Deck software and selected settings and policies within our Offerings, your School’s students may share information with teachers, administrators, and other school personnel. GoGuardian P D i P I S I f i and/or Pear Deck may provide Personal Student Information to certain service providers that act on our behalf to support our Offerings and customers such as information processing and customer support technologies. We may also disclose Personal Student Information about your students if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users; to comply in good faith with any law enforcement, legal, or regulatory process; or in connection with a health and safety exception; or with your School’s consent and/or at your School’s direction; or with parent/guardian/eligible student consent and/or at parent/guardian/eligible student’s direction. Additionally, in the event of a reorganization, merger, or sale, we may transfer any and all Personal Student Information your School provides to the relevant party subject to the terms of this Disclosure the GoGuardian Product Privacy Policy and/or Pear Deck Privacy Policy.

### **Access, Correction, and Deletion of Personal Student Information**

If your School has any questions or concerns regarding this Disclosure, or if your School would like to access, correct, or delete Personal Student Information on behalf of your School or pursuant to parent/guardian requests in accordance with COPPA (or in accordance with FERPA, or other applicable laws), please contact us at [privacy@goguardian.com](mailto:privacy@goguardian.com).

### **Consent to GoGuardian's and/or Pear Deck's Collection, Use and Disclosure of Student Personal Information**

By your School submitting payment (regardless of whether the payment is provided by you, your School’s billing/accounting office, or other School department) to GoGuardian and/or Pear Deck (or providing a code to your Students to use), your School is consenting to GoGuardian’s and Pear Deck’s collection, use, and disclosure of Student Personal Information as set forth in this Disclosure, and you represent and warrant that you have legal authority to provide this consent on behalf of each student. You understand that your School will be able to use GoGuardian Offerings and/or Pear Deck software made available to them in connection with your students, subject to your School’s selected GoGuardian Offerings and/or Pear Deck software and settings.

