Education
and Training

VICTORIA
State
Government

Brunswick South
PRIMARY SCHOOL
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Privacy Impact Assessment (PIA)	
Software	Zoom Video Conferencing Application (Free and Paid versions)
School	Learning from home for Term 2 & 3 in 2020 (due to COVID-19 virus)

Part 1 Risk Assessment

Background	There is currently a vastly increased demand for remote learning tools due to Victoria's legally required social distancing measures during the Corona virus crisis. As schools prepare to enable learning from home for students, Zoom has been chosen by the school as an easy way to provide access to lessons for students. Zoom is a web-based video conferencing tool that allows teachers to meet online, with or without video. Zoom can be used to record sessions, collaborate on projects, and share or annotate on one another's screens. Zoom has many features that are desirable for teaching staff for example: • An account is not required so easy for students to set up • Set up does not require connection with school network • Session can be started with host/teacher on video and student only on audio • Connectivity remains stable with low bandwidth Zoom has also several security issues that must be considered: • Its popularity means that it is the target of 'Zoom bombing' where intruders gain access to Zoom meetings • There are some known security vulnerabilities around webcam access • There is a level of public concern around Zoom's safety which needs to be factored into any school's decision to use it.
Contractual arrangement	Zoom can be a paid service however most schools are currently choosing to use a free version for education and as such each school must agree to Zoom's terms and conditions without alteration. School is to select which of the below options is applicable: 1) A DET template contract has been signed with Zoom specifically for educational purposes (recommended and preferred option), which contains the relevant privacy provisions which bind the ICT supplier to comply with Victorian privacy law. 2) School has agreed to Zoom's terms and conditions and Zoom's Privacy Policy. If the school is to use Zoom on an ongoing basis the DET template contract will be used for the ongoing contractual basis between the school and Zoom. Please note: If the school is signing a contract the school must request that data is transferred to DET and deleted from Zoom systems at the end of the contract.
Notification	Most schools have already used the DET digital learning permission or notification forms (as advised by the Deputy Secretary in the 25th and 26th March 2020 Coronavirus (COVID-19): Teaching and Learning Guidance Notes) however schools must inform parents and student on the use of Zoom. Parents will be provided with a template notice (adapted to the school community) that includes details of what systems will be used as part of learning from home, for example: • the purpose and benefit of using Zoom • what personal information is collected

	- how the system will be used - who will access Zoom and what information they can access/see e.g parents will have access to selected work on their own child's account and/or any third parties used by Zoom If a school has a privacy matrix and/or Digital Learning Statement (which is highly recommended) these will be updated to record what personal information is collected by Zoom, where the information is stored and how the system will be used by the school and any other information required by those documents https://zoom.us/privacy-and-legal.
Student participation in the program	Anyone invited and provided with a password can join a meeting using the Zoom mobile apps or desktop applications. School staff can hold meetings with students and others without them having to create an account. Students under the age of 18 should not go to www.zoom.us to create an account because: they should only be joining Zoom meeting sessions as participants (not separate account holders) and minors are not permitted to create an account. Non-adherence to either points would be in breach of Zoom's Terms of Service.
eSafety	At this stage WebEx or GSuite for Education are the preferred tools for video conferencing however schools who have already spent time and resources implementing Zoom can continue to use it, for term 2 of 2020. A security assessment by IMTD and InfoSafe advises that Zoom Administrators (Hosts) must be assigned to manage school users. Whether using the paid or free version, school staff should securely provide session/meeting information and passwords to the student users to ensure the school can maintain supervision and control over its student users' session/meeting experiences. Practical security actions for schools to ensure the secure use of Zoom include: - School/teacher session hosts must monitor who is in a session and remove any unknown individuals - Students and staff webcams should be covered when not in use (with a post-it note or tape) - Hosts should not make recordings that include students, lessons can be pre-recorded or recorded with student's audio and webcams disabled. - School staff, particularly teachers must ensure that each student's recording ability is disabled in each session so student cannot make their own recordings. - School/teacher session hosts should remind student's about appropriate behaviour and dress in online learning context

Privacy assessment	
Function, use and purpose:	Zoom is used for remote Learning and Teaching – online real-time class seasons hosted by a teacher by video audio and screen sharing. As term 2 of 2020 will be primarily conducted via remote learning, video conferencing is a necessity.
Collection of new information and use of existing information	Students do not require an account to be set up with their personal information to join sessions. However, name, username and email address, phone number and IP addresses are collected when this information is used to access online meetings.
Data location	Zoom's Australian client information is hosted as part of Zoom's Australian Cluster. Back- ups may be stored in California, United States and is subject to the *California Consumer Privacy Act* (CCPA).
Information disclosed	Zoom does not monitor sessions or store them when finished unless requested to record and store them by the session host. Participants are alerted via both audio and video when they join meetings if the host is recording a meeting, and participants have the option to leave the meeting. Zoom has options to limit the use of personal information but these must be activated by users, for example *"Opt Out of "Sales": You can ask us to take you out of certain advertising related to your personal data by clicking on the "Do Not 'Sell' My Personal Information" link."* It may be too onerous for students/ parents to change their own setting to ensure information is handled in the required way.

Anonymity	Anonymity may be partially possible if using a pseudonym but IP address and other information cannot be obscured or removed.
Security and Access.	Students will access video conferencing in Zoom via an invitation sent by the host, usually a teacher. Hosts and users must enable security features such as meeting passwords and additional privacy controls to avoid 'Teleconferencing hijacking' where unknown individuals gain access to sessions and act inappropriately. Zoom offers training and blogs to inform users of appropriate use and settings for secure use of the system. Zoom has a specific product type, K-12 for schools, which is compliant with the requirements of US law: The *Children's Online Privacy Protection Act* (COPPA), the *Federal Education Rights and Privacy Act* (FERPA), the *California Consumer Privacy Act* (CCPA) however it is not currently known if compliance remains at this standard for the free version of Zoom product. Zoom is not a Department supported application; any technical queries must be made directly to Zoom. IMTD will provide technical configurations for Zoom please work with your school technician (TSSP) to implement Zoom appropriately.
Privacy policy	School to follow DET Schools' Privacy Policy. Zoom have privacy policy available here: https://zoom.us/privacy

Principal / School Endorsement

I acknowledge and accept the risks and associated actions (as identified in the Action Checklist) required as outlined in this document.

Name:		Title:	
Signature:		Date:	

Part 2 Privacy Action Checklist for use of Zoom

Action	Completed (*Please tick this column when action completed*)	Not completed *(what variation of the action has the school implemented to ensure a similar result is achieved)*
School privacy compliance:		
Short pre-populated PIA reviewed, completed and signed off by appropriate school staff person and the Privacy Team		
Communication to inform parents of the use of Zoom (and other online learning tools being implemented for term 2) see sample letter provided by Privacy Team		
Review of Zoom when schools resume normal operation. If Zoom to be used on an ongoing basis schools must move to the paid version of the system, using the DET template contract including the appropriate privacy clauses.		
Deletion of information from Zoom - School to request that information is deleted by Zoom if it discontinues using it. When signing a contract the school must request that data is transferred to DET and deleted from Zoom systems at the end of the contract.		
Adhere to IMTD technical controls for zoom, see below. Please discuss with your school technician (TSSP) if unsure of requirements		
Zoom administrators (Hosts) must be assigned to manage school users and ensure:		

• Chat messages can be disabled by the Host but are allowed • Meeting and participant information is displayed in the meeting. Controlling who can join a meeting will mitigate unauthorised access to participant information • File transfer allows files to be sent to other meeting participants during meetings – this should be disabled and locked • Zoom can be live streamed via Facebook and YouTube. This can be disabled at a global level for the school depending on your school's requirements		
Teacher use:		
Teachers/hosts will ensure that any live classes on video conferencing systems are supervised to ensure: • only students and appropriate teaching staff are in the live class • discussions involving personal information are limited to only that which is needed • students behave and dress appropriately • live classes are not recorded or, in the rare case this is considered of value, parent consent is sought prior to recording.		
Demonstration or written guidance or for teachers on the appropriate use of Zoom, including instructions regarding recording students only with consent form parents		
Reminder to teachers on appropriate handling of personal information Schools Privacy Policy		
Student use:		
Students are advised on how to use Zoom appropriately in your school's context including general behavioural and dress expectations for video conferencing		
Teachers to remind students of data security expectations in age appropriate fashion, based on: DET Passwords Policy and the Acceptable Use of ICT Resources		
Parent use		
Parents to be advised how to use appropriately use Zoom, if they are expected to be involved in guiding younger students		

Account Management

Zoom Administrators (Hosts) will need to be assigned to manage school users.

Chat messages

Chat messages are used to share content and initiate group meetings with or without video. In-meeting Chat can be disabled by the Host.

- Teachers: are allowed
- Students: are allowed.

Conference Member Details

Meeting and participant information is displayed in the meeting. Controlling who can join a meeting will mitigate unauthorised access to participant information.

Data Protection and Recovery

Meetings and Chat messaging use 256-bit TLS encryption and all shared content can be encrypted using AES-256 encryption. More information can be found here: https://zoom.us/security

Zoom also has a detailed position on Data Protection and Recovery detailed in the Zoom Global Data Processing Addendum.

Data Sovereignty and Hosting

Australian clients are hosted as part of Zoom's Australian Cluster, providing data sovereignty.

Encryption

By default, Zoom encrypts in-meeting and in-webinar presentation content at the application layer using TLS 1.2 with Advanced Encryption Standard (AES) 256-bit algorithm for the Desktop Client. For dial-in participants joining by phone, the audio is encrypted until it leaves Zoom's data centres and is transferred to the participant's phone network.

End-to-end encrypted chat will securely send chat messages between Zoom users. Encrypted messaging encrypts all chat messages using TLS 1.2 with Advanced Encryption Standard (AES) 256-bit algorithm.

If End-to-end encrypted chat is enabled, users can still send files, pictures, emojis, and screenshots. However, they will not be able to use the integrated GIPHY library, edit sent messages, or search chat message history. In Chat History on the Zoom Web Portal, account owners and admins will be able to see chat participants and the date and time of the last message sent, but they will not be able to read chat messages.

Currently Encrypted chat is disabled by default for all users but can be enabled by a host.

File Transfer

In-Meeting file transfer allows files to be sent to other meeting participants during the meeting through the in-meeting chat.

- Teacher: disabled and locked
- Student: disabled and locked.

Live Streaming

Zoom can be 'Live Streamed' via Facebook and YouTube. This feature can disabled at a global level for the school depending on your schools requirements.

Logging

The 'Operation logs' area in the Admin portal allows account owners and other designated users, the ability to view changes made by Admins on the account. This includes changes in account management, user management, billing, and other advanced settings.

Changes made by users (including owners and admins) to their own personal settings are not reflected here. The Enterprise tenant also allows logs to be exported to an external product, such as a SIEM, via the API - Report Operation logs

Meetings

Hosts can schedule a group meeting, and any user can schedule a 1:1 meeting.

Teacher: anyone can be a participant, but participants should be restricted to 'authenticated users' by the Host when creating the meeting.

Student: only authenticated users can join a meeting.

Meeting Recording

Meeting recording should be disabled and locked for teachers and/or students.

Remote Access Control

Meeting Hosts can provide 1:1 remote support to another meeting participant.

- Teacher: allowed
- Student: disabled and locked.

Remote Control

During screen sharing, the person who is sharing can allow others to control the shared content. The following settings are recommended:

- Teachers: allowed by default. It can still be disabled by user sharing content.
- Students: disabled, and locked.

Note: disabling remote control by default removes the Breakout Room feature.

Screen Sharing

Meeting Hosts should be allowed to screen share content, they can also share to all meeting participants.

- Teachers: allowed by default
- Students: disabled, and locked.

Third Party Plugins

Zoom for Education any third-party plugins will need to be pre-approved your Administrator.

User Registration & Personal Identifiable Information (PII)

All accounts created in Zoom are registered automatically by Zoom's SSO system using SAML 2.0. At this stage Zoom only stores Firstname, Lastname, Email Address and Role. Additional information including Job Title, Phone Number, Company and Location are available and may be added in the future.

Those listed, but not set by SSO, can be modified by the user. Adding them via SSO will replicate what is in the school managed directory and ensure accuracy on each user login. No date of birth, gender, or physical description information should be captured. No school managed passwords should be stored in Zoom.

User Login

Teachers and students must register using their self-managed ID or school credentials. It is recommended that Hosts decline requests from personal email accounts or use a student's real name.

Support

Zoom is not a DET supported application. Contact your school technician for support. If you are experiencing problems with Zoom, then you should contact Zoom via their online contacts.

Zoom resources

Zoom FAQs   Zoom video tutorials