

Stewardship Principles to Protect Student Data & Privacy

The Bill and Melinda Gates Foundation believes that the effective use of data can help improve educational outcomes for all students. Data can empower teachers and school leaders to better understand students' needs, personalize instruction, and identify what works for each student and each classroom. It can give parents and students important information about progress, strengths, and accomplishments. And it can help us understand

what schools are doing well and what they should be doing differently in order to close the achievement gap and prepare every student for success in life. Our job is to make sure that the opportunities for productive uses of data are realized.

Student data must always be used responsibly and in a way that respects individual privacy. The Gates Foundation has and will continue to support grantee partners' efforts to educate and inform students, families, practitioners, and policymakers on these issues. We are committed to safeguards and rules that protect privacy and promote the ethical use of student data, and to fostering responsible stewardship of student data by our grantee partners.

As a component of our proposal review process, any potential grantee that handles students' personally identifiable information must describe their policies and practices to protect student data as well as their strategies for building trust in the positive uses of this information, such as empowering students and families. Grantees will describe:

- How their use of data is in service of improving student outcomes
- That they understand and assume responsibility for compliance with all applicable federal and state laws related to the collection, storage, use and destruction of data
- How they will protect students' data against unauthorized access and use, including vetting of third-party service providers
- Plans to prevent and remedy any breaches of data
- Practices to engage and inform students and/or their parents/guardians (if they are under the age of 18) about what personally identifiable information is being collected, how it is being used, who it is shared with, and how long it will be stored
- Practices to provide students and/or their parents/guardians (if they are under the age of 18) with opportunities to view and correct any consequential, personally identifiable records
- A commitment to never sell or use personally identifiable information for marketing without the informed consent of the student and his/her parents or guardians

How the Foundation Uses Data

The Foundation is committed to the responsible use and protection of student data. The Foundation does not and will not collect confidential personally identifiable student information from grantees.

We use aggregated student data (grouped data that do not have personally identifiable information) to understand and identify new programs for learning and to measure the effectiveness of our programs and grants. We may store aggregated data for longitudinal research and study.

The Foundation will regularly review and update these stewardship principles.

How the Foundation Incorporates These Principles into Grantmaking

Stewardship can be described as the “careful and responsible management of something entrusted to one's care.” During the investment process, we will engage grantees and contractors to proactively address both substantive and communications-related privacy issues. Just as we expect proper management of financial resources, but don't require a particular accounting software program, audit firm, or personnel structure, our approach is to stipulate principles, but recognize that there is no one-size-fits-all approach to how partners may meet them.

- Program officers considering proposals that seek funding for student data-related projects will share and discuss these stewardship principles with prospective grantee partners. We will ask potential grantees to engage on the following types of questions:
 - How does your organization meet the stewardship principles to protect student data and privacy?
 - If funded, what actions will you take to further your responsible stewardship of student data?
 - How will you communicate and engage with families and other stakeholders around these issues?
 - What challenges do you face on these issues? What are your strategies to mitigate against possible unintended uses of data?
- As appropriate, program officers will work with prospective grantees to add outcomes related to enhancing privacy and/or communications about data use to the proposal's results framework. This may require dedicating additional funding to support these efforts.

Additional Actions, Resources, and Supports

The foundation supports a wide variety of grantee partners and fosters field-wide initiatives to develop better stewardship of student data, inform and engage students, families, practitioners, and policymakers, and mitigate against unintended uses and consequences. In addition to these convening and grantmaking efforts, we will:

- Continue to engage with key partners and stakeholders around these issues and update the principles as needed
- Engage other foundations and encourage them to adopt similar principles and field-wide supports