



Virtual Summer Camp Program Notice Regarding Consent and Privacy

Dear Parent/Guardian:

During this time of remote instruction, we will be continuing to utilize and expand our use of online resources to provide continuing, meaningful classroom instruction and learning tools to students. We will be using the Microsoft Teams (“MS Teams”) platform to deliver and manage the unique Holy Trinity Virtual Summer Camp Program. To ensure that students have access to, and can participate in, the remote learning program, we will be conducting both live online instruction as well as providing limited-time access to video and audio recordings of the online classes that can be accessed following the original live class broadcast.

The primary focus of both the live classes and the resulting video and audio recordings will be on the teacher, not on the students. However, questions, answers, comments, and contributions asked and made by students will be part of both the live classes and recordings in order to provide a full, interactive, more “normalized” experience for the students. Other than the assigned class teacher(s) and select school administrators and IT professionals, only students assigned to the specific MS Team for each class will have access to the live stream instruction and recordings through use of their assigned Holy Trinity / MS Teams user account. The livestreams and recordings will not be made public by the school, and the MS Teams recording function for individual student users will be disabled at the administrative level.

Holy Trinity is committed to the safety and privacy of our students and their personal information. MS Teams is an online educational resource provided by a third party, and we want you to be aware of various federal regulations that apply to operators of websites and certain online platforms, and which require parental consent when such parties collect information on minor children. The Children’s Online Privacy Protection Act (“COPPA”) generally requires parental consent for the collection, use, and disclosure of personal information from children under the age of thirteen (13), and the Family Educational Rights and Privacy Act (FERPA) generally requires consent for the disclosure of personal information from students.

We encourage you to learn more about these regulations, which you can access using the following links:

- COPPA: www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule
- FERPA: <https://www2.ed.gov/policy/gen/guid/fpco/ferpa/parents.html>

Holy Trinity complies with COPPA, and although Holy Trinity is not subject to FERPA as it does not receive direct funding from the federal government, nonetheless under the terms of Holy Trinity's contract with Microsoft for the use of the Microsoft tools and services used in Holy Trinity's Virtual Summer Camp Program, Microsoft attests to Microsoft's FERPA compliance. Further, Holy Trinity also has a Business Associate Agreement ("BAA") with Microsoft for use of the Microsoft Office 365 services. Among other Microsoft programs, products, and services, the BAA includes the Microsoft Teams platform used to host live classes and video recordings for our Virtual Summer Camp Program. Microsoft Teams incorporates robust security measures to protect data privacy and security. You can learn more about Microsoft's representations and commitment to FERPA at the following link:

- Microsoft / FERPA: <https://docs.microsoft.com/en-us/microsoft-365/compliance/offering-ferpa?view=o365-worldwide>

In order for your child to participate in the Holy Trinity Virtual Summer Camp Program, Holy Trinity requires your consent as a parent or guardian for the collection, use, and/or disclosure of your child's information in connection with his or her use of these services. Your consent covers the collection, use, and disclosure of your child's personal information for the purpose of your child's registration and use of the software programs described above, as well as your child's participation in the livestream classes, including the broadcast and use of your child's image, name, voice, words, and actions, and the recording, storage, use, and rebroadcast of the live broadcasts, for the limited purposes and under the parameters outlined in this Notice.

If you choose not to provide consent, we will not collect, use, or disclose any personal information from your child for use in connection with the Virtual Summer Camp Program services, but your child will not be able to participate in the Virtual Summer Camp Program or use the associated services.

HOLY TRINITY

Accordingly, we ask that you complete and sign the attached Parent/Guardian Consent and Release Form, and **return to us in electronic format** at:

summercamp@htrinity.org

Subject: WAIVER

Parent/Guardian Consent and Release Form Virtual Summer Camp Program

This form is to be completed by the parent(s)/legal guardian(s) of minor students participating in the Holy Trinity Virtual Summer Camp Program. Please complete the form below to provide your consent. By completing and submitting this form, you are acknowledging and agreeing to the following:

- **I am the parent/legal guardian of the child named below.**
- **I have read and understand the Holy Trinity Virtual Summer Camp Program Notice Regarding Consent and Privacy.**
- **I understand and agree that Holy Trinity and the services / service providers used in the program, such as Microsoft Teams / Microsoft, may collect, use, and disclose my child's personal information for the purpose of my child's registration and use of the software programs and services used in the Virtual Summer Camp Program. I hereby consent to such collection, use, and disclosure of my child's personal information.**
- **I understand and agree that Holy Trinity Virtual Summer Camp Program online instruction will be subject to livestreaming, video, and audio recording, and that livestream, video images, and/or audio recordings of my child may be broadcast and captured. I hereby consent to my child's participation in the Holy Trinity Virtual Summer Camp Program, and to the broadcast and use of my child's image, name, voice, words, and actions, and to the recording, storage, use, and rebroadcast of livestream broadcasts featuring my child's image, name, voice, words, and actions within the parameters outlined in the Holy Trinity Virtual Summer Camp Program Notice Regarding Consent and Privacy**

Student Name: _____

Grade: _____

Signature of Parent or Guardian: _____

Name of Parent or Guardian: _____

Date: _____