

Equity Impact Statement Template for School Committee Proposals and Presentations

Title: Privacy of Student Information in the Boston Public Schools

Date: April 15, 2020

Was the [BPS RACIAL EQUITY PLANNING TOOL](#) used? (Yes or No):

No

BPS Racial Equity Planning Tool Sections	Summary/Rationale
<p>1. Proposal/Presentation & Impact <i>What is the proposal's/presentation's desired outcomes and impact? Who led this process and do they reflect the diversity of BPS students/families?</i></p>	<p>The proposed policy (and corresponding superintendent's circular) aim to:</p> <ul style="list-style-type: none"> ● Provide clear guidance to school-based and central office staff on their obligations to protect the privacy of student information under federal and state law, and describe exceptions where information sharing is permitted; ● Reaffirm the district's commitment to protecting the safety of students and school communities, including sharing information with law enforcement when required by law or in connection with safety concerns. ● Continue to improve our operational practices to ensure a separation between documentation of school discipline and law enforcement documentation of alleged criminal activity.
<p>2. Alignment with the Strategic Plan <i>How does the proposal/presentation align with the district's strategic plan?</i></p>	<p>The proposed policy aligns with several of the strategic plan's commitments by establishing consistent, transparent practices that ensure students' safety while respecting the privacy of student information. Specifically, the proposed policy:</p> <ul style="list-style-type: none"> ● <i>Makes every school a safe space for every student, and offers the support and protection needed to learn, grow and thrive (Commitment 3: Amplify All Voices).</i> By restating the district's legal obligation to ensure the privacy of student information and by providing clear guidance on when legal exceptions are applicable, the proposed policy clarifies expectations regarding the sharing of student information for students, families and staff. ● <i>Eliminates disproportionality in the implementation of the Code of Conduct by ensuring welcoming and affirming classrooms and applying restorative practices (Commitment 1: Eliminate Opportunity and Achievement Gaps).</i> By separating the documentation of conduct used solely for school disciplinary purposes from documentation of conduct required to be reported to law enforcement, and ensuring that the minimum number and type of internal reports are used to ensure student safety and comply with legal requirements, the proposed policy seeks to eliminate unnecessary sharing of student information. ● <i>Pursues operational excellence by identifying performance challenges, and implementing solutions (Commitment 5: Cultivate Trust).</i> By assessing current operations, as described above, and implementing mandatory training for all BPS employees, the proposed policy refines district practices to ensure legal compliance and ensure student safety.

<p>3. Analysis of Data <i>What data did you use to analyze the issue/subject? Was it disaggregated by race? What did it show regarding disparities of historically marginalized populations?</i></p>	<p>Recently, the district learned that a previous iteration of this policy had not been implemented effectively. We immediately initiated a thorough review of retrospective electronic correspondence, and determined that a more detailed and comprehensive policy and implementation plan was needed. While it is difficult to confirm what the individual and systemic impacts have been, we assume that any unnecessary past data sharing with law enforcement was likely to have the most impact on Black, Latinx, and immigrant students.</p>
<p>4. Stakeholder Engagement <i>Who was engaged (quantity, demographics, and roles), how and what did it yield? What did the students/families most impacted by the proposal/presentation say?</i></p>	<p>BPS, in partnership with the Mayor’s Office including the Mayor’s Office for Immigrant Advancement, engaged 12 stakeholder groups, including the Boston Police Department, in developing this policy. Most of the stakeholder groups were community, student, and teacher immigrant advocacy organizations that provided valuable feedback on both the policy and its implementation. Specific suggestions included:</p> <ul style="list-style-type: none"> • ensuring that the policy is clearly communicated and accessible to all families; • requiring training of all staff, especially staff working directly with students and families, as well as contractors and partners who interact with students and families (e.g., staffing after-school programs); • ensuring that culturally competent trauma-informed care is a part of any training. • creating a system of accountability to monitor compliance.
<p>5. Racial Equity Strategies <i>How does this proposal/ presentation mitigate disparities and increase equity, particularly racial equity? What are the unintended consequences? What complementary strategies will further advance equity?</i></p>	<p>By creating transparent, consistent policies regarding the creation and sharing of reports containing student information, the policy will ensure that all students’ information is subject to the same sharing restrictions and clearly defined exceptions to ensure student safety. This policy will mitigate the impact of racism both because the district’s students are majority Black and Latinx, and because Black, Latinx, and students from immigrant families are likely to be disproportionately impacted by overly broad information sharing with law enforcement entities.</p>
<p>6. Budget & Implementation <i>What are the budget impacts? How will implementation ensure equity objectives are met? Are there leadership and personnel who are Black, Latinx and bring a racial equity lens?</i></p>	<p>There are no immediate budget impacts to implementing this policy. The key BPS employees who will implement this policy include school superintendents, school leaders and other school administrators, and Boston School Police. These employees are substantially Black and Latinx, and nearly all have received extensive training regarding racial equity.</p>
<p>7. Accountability & Communication <i>How will impacts be assessed, documented and communicated to stakeholders? Who will be responsible for this?</i></p>	<p>As this policy is implemented, the district will measure the number and type of law enforcement reports written, and the information contained in them, to assess whether staff are properly safeguarding protected student information. The district will continually audit its practices regarding the documentation of discipline to ensure that student education records are not shared with law enforcement . In addition, the district will track staff training completion and the effectiveness of ongoing training.</p>