	Document Title	Recommendations to the NSDL Community for Privacy policy Implementation
	Author or responsible party	Eileen McIlvain; Mick Khoo
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Recommendations to the NSDL Community for Privacy Policy Implementation - **DRAFT**

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INTRODUCTION

Privacy policies are a vital trust component of any website. A comprehensive, easy to find, and easy to read privacy policy supports good relationships between a website and its users. Conversely, privacy policies that are hard to find, hard to read, or otherwise hard to use can damage the trust that a user has in a website.

A clear and comprehensive privacy policy is particularly important for a web site that offers services to young people in educational settings traditionally associated with trust. In the case of nsdl.org, some of these services depend on the site's ability to identify repeat visitors and the implementation of visitor identification processes, such as Community Sign On (CSO). These technologies raise concerns with regard to the collection of user information about children under the age of thirteen.


The information offered here is provided to the NSDL community of partners as support for adoption or revision to their own privacy policies. The language of the *<link to proposed document>* **NSDL Privacy Policy** *</link>* is recommended as a model for community use.

This information was developed from research into general web site privacy and trust issues and into the implications of the 1999 [Children's Online Privacy Protection Act \(COPPA\)](#). It also draws on a comparative survey of existing privacy policy practices among [NSDL Pathways](#) and partners.

PRIVACY POLICY ACCESSIBILITY AND USABILITY

Privacy policy accessibility factors include: whether or not a policy is easy to find on a project website, and whether or not it is written in plain English, or has a plain English summary. It is recommended that:

- A link to the privacy policy should be available on all the pages of a web site
- The link to the privacy policy should be clearly displayed
- If an image is used as the link to the privacy policy, a suitable alt tag must be supplied
- The privacy policy page itself should be in a high contrast font at least the same size as the rest of the website content, on a white background
- The privacy policy page should be easily printable from all browsers
- The privacy policy should be written in plain language. Where, for legal reasons, a website is obliged to post a long, legally correct privacy policy, a prominent link to a short, easy-to-read summary should be provided

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- The privacy policy page should not include content unrelated to privacy, such as terms of use, users' responsibilities, or other information. These other kinds of information should be posted separately elsewhere on the site
- The privacy policy page should be accessible to screen readers

Community Sign On

The National Science Digital Library (NSDL) employs a user registration service known as Community Sign-on (CSO), which allows NSDL users to create an anonymous user account that permits seamless transitions between multiple NSDL sites that require individual user registrations.

Projects adopting CSO should review and add additional clauses to their privacy policies, describing the functions of CSO, and the safeguards in place to protect the information gathered by CSO, dependent on the level of CSO service they implement, and conforming to the legal requirements of their sponsoring organization or institution.

Additional information about CSO may be found at: [insert nsdl.org page URL on CSO].

Questions about CSO may be addressed to the **Email NSDL** service at

<http://nsdl.org/about/contactus/>

THE CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA)

The Children's Online Privacy Protection Act (COPPA) governs the protection of the privacy of web site users under the age of thirteen years. It is enforced by the Federal Trade Commission (FTC). Further information on requirements and guidance to compliance is available at:

- [Drafting a COPPA-Compliant Privacy Policy](#) (FTC)
- [How to Comply with the Children's Online Privacy Protection Rule](#) (FTC)
- [Education and Guidance](#) – Children's Privacy (FTC)– multiple links to guidance on COPPA, including guides for teachers