

RESEARCH STUDY ON CHILD PRIVACY 2014

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(PCPD)**

SUBMITTED BY

**THE CENTRE FOR THE ADVANCEMENT OF
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Executive Summary

In order to identify major privacy concerns and problems encountered by children, the Office of the Privacy Commissioner for Personal Data, Hong Kong (PCPD) commissioned the Centre for the Advancement of Social Sciences Research (CASR) at Hong Kong Baptist University to carry out the ‘Research Study on Child Privacy’ in October 2014.

During the research period, six focus group interviews were held, involving a sample of the following categories of stakeholders:

- i) Parents of kindergarten students
- ii) Parents of primary school students
- iii) Parents of secondary school students
- iv) Junior secondary school students (F1-F3)
- v) Senior secondary school students (F4-F6)
- vi) Teachers of primary and secondary school students

In-depth interviews were also conducted with representatives from four non-governmental organisations (NGOs) whose main focus is children.

Part I – Focus Group Interviews

Personal Data

The study results showed that children perceive their personal information (e.g. name, contact information) and that of their family members, as well as their personal relationship with their friends (e.g. their friends’ personal information, their lives outside school and conversation among friends), as private.

As for their home life, the children said they do not want their parents to check their mobile phones, personal diaries or online social media accounts. They also expressed concern that their parents may listen to or read the messages on their mobile phones in order to find out how they get along with their friends.

At school, the children were concerned that their personal information could be lost, as some teachers do not protect their personal data adequately after collecting it. They also do not want their teachers to know about their family situation, where they have been, or what they have discussed with their friends. Regarding their peers, the children were concerned that their friends could post online photos that they did not like, and they did not want their friends to know about their family (such as marital status of their parents

and the appearance of their family members), passwords for their mobile phones and conversation with friends.

The adults had a different perspective. Due to their concern about children's safety and development, the parents wanted to keep an eye on them, and to learn as much as possible about the whereabouts of their children, their social network and academic performance. Teachers, on the other hand, wanted to get information about their students' family background and financial situation via channels such as student handbooks and social media platforms so that they could provide assistance if required (e.g. students with special educational needs, families under the comprehensive social security assistance scheme, and non-Chinese speaking students).

Respect for Children's Privacy

Most children reflected that, in general, their parents, teachers and peers respected their privacy. However, some children claimed that their parents did not respect their privacy at home by listening to their phone calls or reading information in their social media accounts. It was also found that some teachers would monitor the lives of their students outside school via social media. Some children said a few of their friends would read their messages and view photos on their mobile phones, and even forward them to other parties.

The parents claimed that they respected the privacy of their children, but the teachers said that under special circumstances, they would disregard their students' privacy.

Awareness of Child Privacy

The children said that they were aware of privacy issues, as they usually obtained approval from their friends before posting personal data, photos or videos online. However, some children said they did not obtain the consent of their friends before posting group photos on social networking sites. They were generally aware of behavioural tracking by website operators to build profiles for advertising, and they had concerns about being monitored in this way.

The parents of kindergarten and primary school children thought that privacy awareness among their children was low. On the other hand, most of the parents of secondary school students found that their children were aware of privacy risks and associated problems (e.g. children asking their parents not to post information casually on Facebook). Similarly, the teachers found that senior form students were aware of privacy problems.

Children's Rights

Most secondary school participants in the focus groups did not think they were often given the right to refuse to disclose their personal data. Only a few of them pointed out

that they should have the right to refuse their parents if the request for information involves the privacy of their friends or when they reach the age of 18.

The parents of kindergarten students thought that their children were too young to be given the right to refuse to disclose their personal information. All parents of primary and secondary school students said that they had given their children the right to refuse to disclose their personal data to them as they could not force their children to do so. All the parents agreed that consent should be obtained from their children before posting their personal data on the social media.

In general, the teachers said that they needed to get background information on their students if necessary. They felt that they did not need to obtain consent from the parents or students again because they considered their parents have already accepted that the schools would use the students' personal data in the forms of student handbooks or school notices distributed at the beginning of the school term. Meanwhile, the primary school teachers tended to view the students as too young to mind how the schools collected and used their personal data.

Education and Support

The findings showed that the education and support provided by parents and schools to children concerning their personal privacy is inadequate. Some parents do not have adequate knowledge of how to provide support. What they usually do is to teach their children not to disclose their personal information to strangers. Schools do not provide enough educational support to children on privacy issues either. They might only hold a few talks or classes about privacy issues but not in the formal curriculum. Most of the teachers indicated that they or their schools did not provide support to students on privacy protection. In fact, they felt that the more students knew about their privacy right, the more restrictions would be imposed on schools as they might engage in privacy intrusive acts as needed. Following is a summary of the specific measures the schools take to protect children's privacy:

- i) Folders on computers can only be accessed only by authorised people (e.g. English teachers can only access folders relating to English-related subjects).
- ii) Teachers have to set passwords for files which contain sensitive information (e.g. special educational needs).
- iii) To prevent the disclosure of personal data, only class teachers can obtain and access information relating to the phone contacts of the students and their parents. Non-class teachers who wish to access the personal data of students must obtain approval from the discipline teacher.
- iv) School servers are supposed to be protected by security applications (e.g. firewalls).

Privacy Risks Faced by Students

Some of the interviewed parents admitted that they are very keen on posting their children's photos or videos via social media platforms and mobile apps. Most of the parents of primary school students share computers with their children, and some even use the same email account. The study also revealed that some parents of secondary school students know their children's social media and email passwords.

At school, teachers may wish to monitor their students' behaviour via social media. There is also the risk of handbooks and student identification being lost, exposing students' private data.

Who to Consult on Issues concerning Child Privacy

Students do not seem to know how to react or whom they should consult if they encounter problems concerning privacy. As a result, they will adopt privacy protection measures by their own means. Junior secondary school students adopt some measures to prevent their privacy from being invaded by their parents, such as setting up passwords for their mobile phones, closing the screen of their mobile phones if they are not using them, carrying their mobile phones with them at all times, or creating additional password protection for selected mobile applications.

Senior secondary school students adopted other measures to protect their data privacy from being invaded by their peers and on the Internet by removing tags on Facebook, asking peers direct to delete information if necessary, adjusting their privacy setting to "friends only" on Facebook, using fake information when registering accounts online, or not putting personal information on Facebook.

Circumstances When Child Privacy Can Be Violated

The children interviewed in the focus groups agreed that parents should be able to know their whereabouts and their friends' information in case of a dangerous situation. Most parents thought that they should have the right to violate their children's privacy under dangerous circumstances (e.g. when it involves offences including intercourse with someone under age or when there is a risk to their personal safety) as their children may lack the maturity to deal with certain situations. The teachers agreed that schools should have access to students' private information in certain cases (e.g. for the purpose of counselling, discipline or extracurricular activities).

Part II – In-depth Interviews

Child Privacy in Hong Kong

The majority of the interviewees from NGOs commented that children's privacy has improved in Hong Kong because of the Personal Data (Privacy) Ordinance. Awareness of privacy is seen to increase with age; therefore, the interviewees stated that young children still need guidance from their parents and teachers to protect their personal information. The majority of the interviewees particularly expressed concerns about online privacy and considered children's awareness of online privacy to be low.

One of the interviewees pointed out that parents are always given the authority to give consent or make decisions on behalf of their children below 18 years old, but that such decisions may neglect the rights and autonomy of their children, and may not fully represent their views on such issues as school drug testing or class boycotts.

Child Privacy Education

Most of the NGO representatives thought that schools, teachers and parents attribute low priority to privacy and are more concerned with academic issues and assessments. Privacy, therefore, is not a topic that exists within the school curriculum. They may only organise talks on related topics.

Suggestions for Improvement

Suggestions were given by the NGO representatives interviewed to improve the current situation concerning children's privacy:

PCPD

1. Strengthen education and promotion.
2. Advise procedure that facilitates children's complaints.
3. Provide more support to children's organisations, particularly NGOs.

Education Bureau

1. Identify major privacy-related topics and add them to the curriculum.
2. Conduct talks on the types of personal data that can or cannot be posted online.

Schools

1. Add privacy to the curriculum of General Studies or Liberal Studies in primary and secondary school, respectively.

2. Provide training on child privacy on schools' staff development days.
3. Partner with the PCPD or other NGOs to carry out privacy activities.
4. Produce parental guides and educational resources.

Interviewed Organisations

1. Cooperate with the PCPD to organise seminars or other activities.
2. Continue to provide talks to educate on child privacy.
3. Provide comments and suggestions to the PCPD when appropriate.
4. Review the policy and practices of the organisation.

Future Issues in Child Privacy

NGO representatives suggested that children will face more serious situations in the future, as they now are starting to use the Internet at very young age. In addition, more devices are now available that can connect to the Internet. While children will have more opportunities to use and access the web, the risk of leaking personal information will also increase. For example, the personal information of a student who actively participated in social issues was intentionally disclosed on the Internet.

Part III – Comparison of Major Findings

Information Perceived as Private That Stakeholders Wish To Know

Both parents and teachers said they wish to know more about their children/students which is perceived as private by the children. Parents are concerned about their children's social networks, while teachers need to get comprehensive personal information about their students (including detailed family background information, financial and marital status of their parents) which are also perceived as private by the students and do not want to be disclosed.

Awareness of Privacy

It was found that both parents and teachers agree that older children are more aware of privacy issues, while younger children are seen as being unaware of privacy risks and lack the ability to protect their privacy. Both the parents and teachers who participated also mentioned that some children are not aware of privacy problems and therefore do not know how to protect their privacy.

Respect for Privacy

Generally, students said that parents and teachers respect their privacy, but that many students do not respect each other's privacy. All parents and teachers who participated said that they respect their children's/students' privacy and that the youngsters have the right to refuse to disclose their personal data. However, the parents with younger children reflected that they want to know more about their children to protect them. The teachers also respect the privacy of students except for situations in which they have to handle discipline problems.

Consent

Three groups of participants expressed different views concerning consent issues. Most of the participants from the student groups said they would obtain permission from their peers before posting their personal information online, but all parents of kindergarten and primary school students, as well as teachers, agreed that they generally do not have to obtain approval before collecting and using the children's personal information.

Perceived Privacy Risks and Problems

The findings showed that students have concerns about privacy at school and among their peers, but are less concerned at home. The students are worried that teachers do not keep and handle their personal information safely, especially when saving their personal data on computers connected to the Internet.

Regarding the installation of CCTVs in public areas of schools, the study showed that students in general do not regard this as a privacy issue, and think that it is only for security purpose on the school campus.

Children may also be exposed to privacy risks because of daily habits or neglect. Some parents revealed that they are keen on posting and sharing their children's photos and video clips via social media platforms and mobile apps. In schools, teachers may monitor their students' behaviour via social media networks, while there is a risk of exposing personal data if student handbooks or identification is lost.

Use of ICT and Social Networks

All students, parents and teachers are active users of information and communications technology (ICT). Children may be exposed to risks as parents and schools post and share their personal information online without adequate protection measures. Study showed that parents frequently post photos of their children on social media platforms and share photos via mobile applications. Schools also post children's class allocation information on their websites.

Support Provided to Children

Results showed that parents, teachers and schools seldom provide support to children concerning privacy protection. Most parents have no idea on what to do to support their children to manage privacy problems, while teachers even reflected that they do not really like to teach students about these issues as schools may engage in acts that may intrude on privacy sometimes as needed. Therefore, children also do not receive much support from their parents and their schools.

1. Background

A series of recent incidents revealed that awareness of children's privacy protection among parents, peers and educators may be weak and the incidents caught the attention of the Office of the Privacy Commissioner For Personal Data (PCPD) who decided to carry out exploratory research targeting children (e.g. below 18 years old), a vulnerable population, to understand their needs and their stakeholders' (e.g. parents and teachers) concerns. This study is aimed at assisting the PCPD to devise customised educational programmes and help strengthen education concerning the protection of child privacy in the future.

The Centre for the Advancement of Social Sciences Research (CASR) was commissioned by the PCPD to discover the issues relating to child privacy.

This report is an account of a descriptive study concerning the problems faced by children relating to privacy. The results include qualitative analysis of focus groups conducted in October 2014.

2. Objectives

The objectives of this study were to identify major privacy concerns and problems encountered by children. The results will provide a reference for the PCPD to priorities the issues and define the scope of the survey in the next stage.

3. Methodology

3.1 Focus Groups

Focus groups and in-depth interviews were conducted in order to collect opinions concerning child privacy.

Focus group interviews were conducted in October 2014 with a sample of six categories of stakeholders:

- i) Parents of kindergarten students
- ii) Parents of primary school students
- iii) Parents of secondary school students
- iv) Secondary school students (F1-F3)
- v) Secondary school students (F4-F6)
- vi) Teachers of primary and secondary school students

For groups involving students, participants included males and females from different schools, who live in different districts and study at different levels.

For groups involving parents, participants included males and females from different educational levels, different family incomes and who live in different districts.

For groups involving teachers, participants included males and females who live in different districts and are from different ranks.

Table 1: Overview of the target respondents which were interviewed in the focus groups

Table 1.1: Parents of kindergarten school students

| Sex | Education | Family Income | District |
|------------|--------------------------|----------------------|-----------------|
| M | Bachelor's Degree | \$20,000-\$24,999 | Sha Tin |
| F | Bachelor's Degree | \$40,000-\$49,999 | Kwun Tong |
| F | Bachelor's Degree | \$50,000 or above | Sha Tin |
| F | Secondary School | \$20,000-\$24,999 | Sha Tin |
| F | Master's Degree or above | \$50,000 or above | Sai Kung |
| F | Bachelor's Degree | \$15,000-\$19,999 | Wong Tai Sin |
| M | Master's Degree or above | \$20,000-\$24,999 | Kowloon City |

Table 1.2: Parents of primary school students

| Sex | Education | Family Income | District |
|------------|----------------------------|----------------------|-----------------|
| F | Secondary School | \$10,000-\$14,999 | Sha Tin |
| M | Master's Degree or above | \$35,000-\$39,999 | Wong Tai Sin |
| F | Bachelor's Degree or above | \$30,000-\$34,999 | Wong Tai Sin |
| M | Bachelor's Degree or above | \$15,000-\$19,999 | Wong Tai Sin |
| M | Master's Degree or above | \$50,000 or above | Sha Tin |
| F | Bachelor's Degree or above | \$50,000 or above | Kwan Tong |
| F | Secondary School | \$25,000-\$29,999 | Tsuen Wan |
| M | Secondary School | \$30,000-\$34,999 | Kwan Tong |
| F | Bachelor's Degree or above | \$50,000 or above | Wong Tai Sin |
| M | Bachelor's Degree or above | \$35,000-\$39,999 | Eastern |
| M | Bachelor's Degree or above | \$25,000-\$29,999 | Southern |

Table 1.3: Parents of secondary school students

| Sex | Education | Family Income | District |
|------------|----------------------------|----------------------|-----------------|
| F | Secondary School | \$25,000-\$29,999 | Tsuen Wan |
| F | Secondary School | \$15,000-\$19,999 | Tuen Mun |
| F | Secondary School | \$15,000-\$19,999 | Kowloon City |
| F | Secondary School | \$35,000-\$39,999 | Yau Tsim Mong |
| F | Secondary School | \$25,000-\$29,999 | Yau Tsim Mong |
| F | Bachelor's Degree or above | \$25,000-\$29,999 | Sai Kung |
| F | Secondary School | \$50,000 or above | Sha Tin |
| F | Secondary School | No income | Sai Kung |
| M | Bachelor's Degree or above | \$35,000-\$39,999 | Tsuen Wan |

Table 1.4: Secondary school students (F1-F3)

| Sex | School | Level | District |
|------------|---|--------------|-----------------|
| F | SKH Bishop Mok Sau Tseng Secondary School | S3 | Tai Po |
| F | ECF Saint Too Canaan College | S2 | Kwun Tong |
| M | Stewards Pooi Kei College | S1 | Wong Tai Sin |
| F | United Christian College (Kowloon East) | S3 | Kwun Tong |
| F | Pope Paul VI College | S3 | Kwai Tsing |
| F | Pope Paul VI College | S3 | Kwai Tsing |
| M | Pentecostal Lam Hon Kwong School | S2 | Sha Tin |
| M | Pentecostal Lam Hon Kwong School | S2 | Sha Tin |
| F | SKH Bishop Mok Sau Tseng Secondary School | S3 | Tai Po |

Table 1.5: Secondary school students (F4-F6)

| Sex | School | Level | District |
|-----|--|-------|---------------|
| M | The Church of Christ in China Kei To Secondary School | S5 | Kowloon City |
| F | St. Francis' Canossian College | S6 | Wan Chai |
| M | Queen's College | S6 | Wan Chai |
| F | Beacon College | S5 | Yau Tsim Mong |
| F | CUHKFAA Chan Chun Ha Secondary School | S6 | Sha Tin |
| F | Tak Oi Secondary School | S5 | Wong Tai Sin |
| F | Confucian Ho Kwok Pui Chun College | S6 | Tai Po |
| F | Lingnam Dr. Ching Wing Kwong Memorial Secondary School | S6 | Kwai Tsing |
| F | Lingnam Dr. Ching Wing Kwong Memorial Secondary School | S6 | Kwai Tsing |

Table 1.6: Teachers of primary and secondary school students

| Sex | School | Type | District | Rank |
|-----|--|-----------|---------------|---------------------|
| M | Ling Liang Church E Wun Secondary School | Secondary | Island | Teacher |
| M | Pui Shing Catholic Secondary School | Secondary | Yuen Long | Supervisor or above |
| M | Asbury Methodist Primary School | Primary | Kwan Tsing | Supervisor or above |
| F | Pui Shing Catholic Secondary School | Secondary | Yuen Long | Teacher |
| M | SKH Kei Hau secondary school | Secondary | Kwan Tong | Supervisor or above |
| F | POH 80th Anniversary Tang Ying Hei College | Secondary | Sai Kung | Teacher |
| F | Canossa School (Hong Kong) | Primary | Eastern | Teacher |
| F | Po Leung Kuk Camões Tan Siu Lin Primary School | Primary | Yau Tsim Mong | Teacher |

The questions were designed before conducting the focus groups and are attached in Appendix I.

3.2 In-depth Interviews

In-depth interviews were conducted with representatives from NGOs, which are involved in the activities of children.

The questions were designed before conducting the in-depth interviews and are attached in Appendix II.

Table 2: Overview of participants which were interviewed during in-depth interviews

| NGO | <i>Representative</i> |
|---|--|
| The Hong Kong Committee on Children's Rights | Executive Secretary |
| The Hong Kong Federation of Youth Groups | Supervisor |
| Federation of Parent-Teacher Associations, South District, HK | Chairman |
| Hong Kong Family Welfare Society | Senior Manager (Enhancement & Facilitation) and Manager (Youth Services) |

Key Findings

Part I – Focus Group Interviews

This section summarise the results of focus group interviews from the perspectives of children, parents and teachers.

A. Children's Perspective

(i) General Personal Value Of Privacy

Perceived Degree Of Privacy Of Data

Among all junior secondary school students, four attributed a lower importance to Facebook passwords in relation to the privacy of data. These students considered that privacy settings on Facebook could be changed and Facebook is only for leisure (e.g. updating their status). Despite the above, one argued that Facebook passwords are still important as account authorisation is always required to login to other online accounts. If the Facebook passwords were leaked, these accounts may also be accessed without authorisation and this may result in financial loss. Two other students indicated that mobile phone numbers should be private as they do not want to receive promotional calls. Hong Kong Identity Cards (HKIDs) were also mentioned as it is highly private as they uniquely represent a person.

Some senior secondary students found that residential addresses and their whereabouts are highly sensitive. These students considered that it would be dangerous if they could be traced and disturbed. A few stated that they do not want people to disturb them by telephone, therefore mobile phone numbers are also regarded as private data, while bank account numbers were also mentioned.

Consequences Of Improper Use Of Personal Data

Both groups of students indicated that identity theft is one of the consequences of improper use of personal data. They were worried that they could be impersonated and this information could be used for illegal means as well as to borrow money from financial institutions.

“People could swindle or steal money if they know the password of a person’s bank account.” (Junior secondary school student)

“People can login to another person’s Facebook account to pretend to be the user to post messages.” (Junior secondary school student)

Other consequences mentioned by the secondary school students included being cyberbullied, receiving unwanted promotional messages or having secret information leaked.

People To Consult About Privacy Problems

Teachers came out on top when junior secondary school students were asked who they would consult when encountering privacy problems. Others mentioned that they might also consult included family members, friends and social workers.

Senior secondary students were able to mention about the PCPD, the police and companies should they encounter any privacy problems in addition to seeking help from their families and friends.

(ii) Child Privacy Involving Family & Parents

Personal Data That They Do Not Want Parents To Know

Both junior and senior secondary school students considered that their social networks, particularly the information about their peers, and the content of their communications, no matter if on Facebook, WhatsApp or mobile phone, is private data.

“I do not want my parents to know the appearance, names and contact numbers of my friends.” (Junior secondary school student)

“I do not want my parents to know what I have posted and discussed with friends on Facebook.” (Junior secondary student)

“I worry my parents learn about my friends’ recent situation and where I have been with my friends.” (Junior secondary school student)

“My parents like to hear what I talk to my friends about on the phone; therefore, I have to talk secretly on phone with my friends so that they cannot hear.” (Senior secondary school student)

Apart from the above, some senior secondary school students indicated that they did not want their parents to see photos taken with friends or read their diaries.

“I do not want my parents to read my diary. I usually write where I have been and what I have done.” (Senior secondary school student)

Respect Of Privacy By Parents

In general, the majority of the secondary school students agreed that their parents respect their privacy. For those who claimed their parents disrespect their privacy, they made the following statements;

“My parents read my Facebook without asking me first.” (Junior secondary school student)

“My parents have stood behind me to read my messages on my mobile phone while I was typing.” (Junior secondary school student)

“My parents try to listen to my phone calls.” (Senior secondary school student)

Perceived Privacy Concerns At Home

While the majority of the secondary school students did not have privacy concerns at home, a few junior secondary school students were worried about the data stored on their mobile phones.

“I worry my parents will listen to the voice recordings on WhatsApp, so I carry my mobile phone with me at all the times.” (Junior secondary school student)

The majority of the senior secondary school students explained that they trust their family members but they have already adopted measures to protect their private data; therefore, they do not worry much about privacy at home. These measures include setting passwords on their mobile phones, not adding parents on Facebook or adding parents on another Facebook account, and not letting parents access their mobile phones and diaries.

Perceived Right To Violate Privacy By Parents

Secondary school students unanimously agreed that safety is the primary concern of their parents and therefore parents should be allowed to violate their privacy when they engage in activities perceive as dangerous (e.g. hiking, joining the Occupy Central protest, going out at night).

To ease the worries of their parents, junior secondary school students elaborated that they are willing to disclose their estimated time to return home, their itinerary and the contact information of any accompanying friends.

Right To Object To Disclose Personal Data

The vast majority of the secondary school students do not consider that they have the right to refuse to disclose their personal data. A few secondary students commented that they should be allowed to refuse to disclose data to parents if it involves the privacy of their friends, or if they have reached the age of 18.

Guidance By Parents Concerning Privacy Protection

Students were generally of the opinion that their parents only provide minimal support or guidance on privacy protection. A few junior secondary school students stated that they were reminded by the parents to adopt the following measures;

“My parents remind me to set a password on my mobile phone and for all my accounts.” (Junior secondary school student)

“My parents advise me to change my password every few months.” (Junior secondary school student)

For senior secondary students, they recalled that their parent’s advice does not just relate to mobile phones;

“My parents instructed me to remove addresses and names before throwing away letters.” (Senior secondary school student)

“My parents asked me not to disclose my bank account numbers or passwords to others.” (Senior secondary school student)

“My parents told me not to disclose my personal information over the telephone.” (Senior secondary school student)

Measures To Prevent Privacy Invasion By Parents

Student mentioned a number of measures to prevent their privacy from being invaded by their parents:

Measures mentioned by the junior secondary school students:

- i. Set a screen lock password for their mobile phone
- ii. Switch off their mobile phones screen when it is not in use
- iii. Carry their mobile phone with them at all times
- iv. Set additional passwords to protect selected mobile applications

Measures mentioned by the senior secondary school students:

- i. Set a screen lock password for their mobile phone
- ii. Lock their diary in a secret area at home
- iii. Hide their letters in a secret area at home
- iv. Hide their files within the inner directories of their computer
- v. Close the browser or switch off the screen of their computer when it is not in use
- vi. Communicate with their parents on what information they are allowed to access

(iii) Child Privacy & School Teachers

Personal Data That They Do Not Want Teachers & Schools To Know

Although some junior secondary school students have added teacher's on their Facebook friends list and on WhatsApp group chats, they are reluctant to let their teachers and schools know their communications with peers on Facebook and via mobile phone. Some senior secondary school students stated that they would avoid letting teachers know their discussion content or whereabouts on Facebook.

Junior secondary school students reported that;

“I do not want my teachers to know where I go out with my classmates.” (Junior secondary school student)

“I sometimes seek assistance from classmates on the assignments on WhatsApp group chats and I do not want my teachers to know about this.” (Junior secondary school student)

For senior secondary students, a few indicated that they do not want teachers to know information about their family, such as financial situation and relationship status.

“I do not want teachers to know my family's financial situation, such as the type of financial assistance I have applied for.” (Senior secondary school student)

“I do not want teachers to know how the relationship of my family members is.” (Senior secondary school student)

Some senior secondary students added that they do not want to disclose information about their daily life after school.

Respect Of Privacy By Schools & Teachers

All junior secondary school students and some senior secondary school students found their teachers respect their privacy. Among those who found their teachers disrespect their privacy, they stated that;

“I learnt that when a teacher knows students' discussion content or school lives outside of school through Facebook, the teachers will follow up by meeting the students and their parents.” (Senior secondary school student)

“I saw teachers scold students in front of their classmates because the students made a mistakes or obtained low marks.” (Senior secondary school student)

“I would use another account to add teachers in the future.” (Senior secondary school student)

A few senior secondary students stated that they would delete messages or use another account to add teacher's on Facebook as they felt their school does not respect them.

Perceived Privacy Concerns At School

Senior secondary school students expressed more concerns over personal data privacy at schools compared to junior secondary school students.

A few junior secondary school students indicated that they do not mind disclosing personal data like their name, photos and class allocation results on both the Internet and noticeboards as they do not perceive this data as sensitive.

On the contrary, some senior secondary school students expressed concerns about schools leaking personal data, particularly the data stored on computer networks. They also recalled some incidents in which teachers improperly handled their data;

*“I find the recycled paper that teachers use contains names and IDs of students.”
(Senior secondary school student)*

*“When submitting forms in class, teachers simply ask us to pass it from one student to another; therefore students can see other people's personal data on the forms.”
(Senior secondary school student)*

“After teachers collected the notices with personal information on them, they left them unattended in the classroom for a long time, meaning others could also see the notices.” (Senior secondary school student)

“When teachers ask us to provide personal information, they just pass a sheet to us to fill in one by one. In this case, other people can also see the personal data on the sheet.” (Senior secondary student)

Concerning CCTV in schools, all of the secondary school students did not have concerns about being video-taped as they considered that CCTV is used for security reasons and installed mainly in public areas like corridors, laboratories and computer rooms. A few junior secondary school students indicated that they were not even aware whether their schools had installed CCTV.

Right To Object To The Disclosure Of Personal Data

All junior and senior secondary school students considered that they have no right to refuse their schools to collect and disclose their personal data to others.

Guidance By Schools & Teachers On Privacy Protection

None of the senior secondary school students found that their schools provided any support regarding privacy protection. Only one junior secondary student recalled that

they had attended a seminar organised by the school regarding privacy protection, but such seminar is only conducted once a year or less. Another junior secondary school student claimed that privacy issues had been discussed in computer classes.

Some junior secondary school students mentioned that teachers had causally reminded them not to provide personal data to others easily.

Measures To Prevent Privacy Invasion By Schools & Teachers

Students did not adopt any preventive measures to prevent privacy invasion by schools and teachers. Only a few junior secondary school students claimed that they had put personal items in lockers to protect their privacy.

(iv) Child Privacy & Social Networks & Peers

Personal Data That They Do Not Want Their Peers To Know

In general, students treated information relating to their family members as sensitive data. Some junior secondary school students indicated that they would not want their peers to know the appearance of their family members and their family situation (e.g. single family).

A few students mentioned that they would not want their peers to know the passwords of their mobile phones and the content of their conversations with close friends.

A few senior secondary school students mentioned that they would not want their peers to know information relating to their family members.

Respect Of Privacy By Peers

All senior secondary school students claimed that their peers respect their privacy, whereas a few junior secondary schools students opposed this notion. These junior secondary school students stated that their friends read WhatsApp messages and browsed their photo albums on their mobile phones. One participant verbalised the situation;

“I have sent something to a friend, but she then forward it to other people.” (Junior secondary school student)

“My friends always try to guess the password of my mobile in order to login. My mobile has been locked because of this.” (Junior secondary school student)

Perceived Privacy Concerns Concerning Peers

Secondary school students were focused on their privacy online, particularly posting photos. They generally had little concern about posting group photos on social network

sites like Facebook, but they preferred that their friends obtained prior consent before posting information involving them.

The vast majority of the junior secondary school students claimed that they ask for a friend's permission before posting personal data, such as videos and photos. A few junior secondary school students pointed out that the type of photo matters, for instance; they would not allow their friends to post sneaky snapshots or photos which were taken with malicious intent. A few junior secondary school students stated that they sometimes applied distortion to photos to prevent the disclosure of their friend's identity.

In contrast, only a few senior secondary school students asked for consent before posting their peer's photos or videos on social network sites. Senior secondary school students viewed that their peers should have expected that group photos are for public viewing, and if someone does not want their photos to be posted online, that they should voice their disagreement.

Data Disclosed Through The Use Of ICT

Junior secondary school students are aware of the privacy problems associated with the use of Twitter and Facebook. This can be best expressed by the description of a respondent;

*“I know that a student posted messages on Facebook, the content was subsequently screen captured and posted in Hong Kong Golden discussion forum by others.... the incident aroused the school's attention and the teachers had to follow up.”
(Junior secondary school student)*

Some secondary school students are aware of behavioural tracking by website operators in order to build profiles for advertising, and they had concerns about being tracked. Some of the students added that they were also tracked on YouTube and Facebook. Junior secondary school students were not worried about being tracked by website operators as they found that these websites sometimes make good recommendations.

Measures To Prevent Privacy Invasion

A few junior secondary school students adopted measures mainly to safeguard the data stored on their mobile phones, such as setting password protection and placing their mobile phone in a safe location.

Senior secondary students have used several measures to protect their data privacy from being invaded by their peers and online:

- i. Removing the “tag” on Facebook
- ii. Asking their peers to delete directly if necessary
- iii. Adjusting the privacy setting to “friends only” within Facebook

- iv. Using made up information when registering accounts online
- v. Avoiding disclosing personal information on Facebook

B. Parents' Perspective

Information They Wish To Know & The Collection Methods

Tracking The Location Of Children

In general, most parents of kindergarten students expressed great concerns about the safety of their children and would track their whereabouts. A few indicated that they had installed CCTV at home. Very often members of their family or domestic helpers would look after their children and these parents would have to stay in contact with their children through WhatsApp or by telephone.

Most of parents of primary and secondary school students would contact their children directly by telephone, while they would also contact the school when they would like to know the whereabouts of their children.

Social Networks

Some of the parents would wish to discuss directly with their children about their friends at school. A few indicated that they had found information about their children's social networks through school activities, while a small group also indicated that they would also make use of a WhatsApp group created by parents to understand more about the friends of their children.

Data Disclosed Through The Use Of ICT

Some of the parents of kindergarten students indicated that they actively shared photos and videos of their children on Facebook. These types of photos might include those of children in the shower.

"I write letters to my child on Facebook so that my child can read them when he grows up. I also put funny photos and videos online to share with the others."

Some also indicated that they would communicate with friends and parents about their children over other social media such as WhatsApp and WeChat.

The vast majority of the parents of primary school students shared the same computer with their children at home. A few mentioned that they shared the same email accounts with children, while others would also use Facebook to share photos of their children on occasions such as birthdays, while travelling and at gatherings and award ceremonies. Their children were pictured in their school uniforms in some cases.

Parents of secondary school students were aware not to disclose their children's school information through ICT channels, but a few indicated that they also used social media to share photos through Facebook and WhatsApp, although their children might request them not to. Most of them mentioned that they shared computers with their children at home and some also knew the passwords of their children's Facebook and email accounts.

Respect Of A Child's Privacy

In general, all parents expressed that they would respect the privacy rights of their children.

Most parents of kindergarten students expressed concerns about photos of their children being shared on the social media. They were aware that they should not post photos showing sensitive parts of their children's bodies.

"I will remind my friends not to do so. People may use the photos for other purposes and it may affect the child's future."

All parents of primary school students expressed that they would respond to their children's explicit requests to not share their personal information. A few parents indicated that they might read their children's mobile phones and diaries with an attempt to know more about their lives.

All parents of secondary school students indicated that they absolutely respect their children's privacy and that they have allowed their children to say no when there is something that they do not want to reveal. However, a few pointed out that they have tried to see the content of discussions on WhatsApp or Facebook on their child's mobile phone. Some might read the mobile phones together with their children, while a few looked at their child's Facebook password.

Parental Consent Collected Before Collecting Their Children's Data

All parents of secondary school students agreed that they should have the consent of their children before using their data. This differed from the view of those parents of kindergarten and primary school students as most did not treat it as necessary.

Perceived Privacy Concerns & Risks Faced By Children

Parents of kindergarten students admitted that their children could be exposed to privacy risks due to the increasing use of social media. They might also disclose personal data such as their names and addresses to strangers.

Parents of primary school students also expressed their concerns about their children's ability to protect their own privacy. A few indicated that their children's privacy rights

could be broken as schools tend to collect excessive information through school activities and application forms.

It was obvious that secondary school students were found by their parents to be more cautious about their privacy risks, however, most parents were not confident that their children would be able to manage the risks. A few indicated that their children might be unaware of the consequences of disclosing their personal data to others.

Perceived Right To Violate Privacy

Parents of kindergarten students were of the view that their children were too young to understand their privacy rights and that personal safety is still of a high priority

All parents of primary school students agreed that they should have the right to violate their children's privacy under the following circumstances:

- i. when it involves certain offences (e.g. intercourse with someone under age)
- ii. when there is risk faced by their children (e.g. personal safety)
- iii. when the children are too young
- iv. when their psychological development is immature

Most of the parents of secondary school students agreed that they would still find ways to know about their children's everyday lives. All of them would exploit other means such as becoming "friends" not only with their children, but also to their children's teachers, friends and parents of their friends on Facebook.

Rights Given To Children To Object To The Disclosure Of Personal Data

While a few parents of kindergarten students inclined to view that their children are too young and should not be allowed to refuse to disclose their personal data, all parents of primary school students held the opposite view. If primary school students refused to disclose their personal data, parents would not insist to follow up. All parents of secondary school students were relatively pessimistic as their children are mature and they could, by no means, force their children to disclose their personal data.

Confidence In Supporting Children Over Privacy Problems

The parents of all primary school students were more confident in providing support to their children to manage privacy problems. For those who indicated that they were not confident, the main reason was a lack of knowledge of the topic.

Measures Adopted To Protect Children's Privacy

Several measures mentioned by parents of kindergarten students to protect their children's privacy included ceasing their Facebook accounts; storytelling and sharing real cases and avoiding revealing their children's names publicly.

A few parents of primary school students would teach their children not to disclose their personal information to strangers. Some of them would also remind their children by using daily life examples and real cases; while a few would use stickers to cover their children's name tag on their uniform.

Parents of secondary school students appeared to be cautious as a few would teach their children not to disclose their HKIDs and addresses to the others, while others would even not allow their children to use using social media when they were not with their children.

C. Teachers' Perspective

Information They Wish To Know & Collection Methods By Teachers & Schools

In general, teachers mentioned the information that they or their schools wish to know includes students' name, students' HKID, residential address, students' height and weight, parents' names and contact information, parents' occupations, family background (e.g. whether parents are divorced and the relevant custody arrangements of the student and whether parents needed to work outside of Hong Kong and who takes care of the student), family's financial situation (e.g. whether they receive Comprehensive Social Security Assistance (CSSA)), students' health condition (e.g. whether the student is sensitive to any type of food), any specific needs for the student (e.g. Students with Special Educational Needs (SEN) including attention deficit hyperactivity disorder or autism, Non-Chinese speaking (NCS) students).

A few secondary school teachers pointed out that they have to collect passport and Home Return Permit information for organising exchange tours and that they have to know the lives of their students outside of school (e.g. whether students have part-time jobs, are dating).

All teachers claimed that their schools collected nearly all personal information by asking parents to fill in forms and/or notices at the beginning of the school term when the students started to study at their schools for both primary and secondary schools.

A few primary school teachers mentioned that schools also collected some detailed information by asking parents to fill in handbooks, while some indicated that they would only read students' Facebook if they found the students misbehaved (e.g. using foul language at school).

A few secondary school teachers indicated that they knew information about students by talking to them and reading Facebook or WhatsApp group messages, while some also

mentioned that they knew detailed information of students from social workers, especially for SEN students.

Teachers of both groups also mentioned that they could access WebSAMS (Web School Administration and Management System) to obtain detailed information about students.

All teachers claimed that their schools did not collect biometric data from students.

Data Disclosed Through The Use Of ICT

A few secondary school teachers mentioned that they had taken photos of students misbehaving and sent it to the student's class teacher to follow up. Some claimed that the results of class allocation information had been posted on websites and noticeboards at school and could be viewed by others as they thought that this information was not too sensitive. A few mentioned that their school released results of class allocation and indicated whether the students were allocated to SEN classes. Some indicated that their schools obtained consent from the students by asking them to sign a consent form regarding the posting of their name, class, class number and photo onto the schools website. A few pointed out that staff could only access the students' information in school.

A few secondary school teachers claimed that the card system disclosed personal information.

“The card system shows the student's name, class, student number and photo, and when students put their card on the system, others can see all the information.”

In most of the cases, it was the students who sent invitation request to their teachers on social media, while a few primary school teachers stated that they would use a fake or separate account to add their students and their parents as friends.

A few secondary school teachers indicated that as far as they knew, there were teachers who had approached a problem student by pretending to be another person on Facebook so as to understand the lives of the students outside of school. Some indicated that students added their Facebook contacts and a few of them used separate accounts to communicate with students.

Some secondary school teachers indicated that they would follow up with students if they discovered any inappropriate behaviour on Facebook (e.g. using foul language and bullying). There was a case that a student posted a school exam paper on Facebook and the participants subsequently reported the incident to the class teacher to follow up.

A few secondary school teachers mentioned that they used Facebook for organising school activities and project members could see the content and communicate on

Facebook. A few also claimed that they were added to WhatsApp groups by organisers of school activities, therefore allowing students to know their telephone number and other information displayed on their WhatsApp profile (e.g. name and photos).

Furthermore, when students and parents had arguments on WhatsApp, teachers and schools were always requested to intervene.

Respect Of A Child's Privacy

In general, teachers of both groups agreed that they did not need to obtain consent from their students because they considered that the parents had already agreed on the forms, notices and/or handbooks at the beginning of the school term to use the students' personal data.

Primary school teachers tended to view that students are too young and they do not quite care or mind how the schools or teachers collect and use their personal data.

A few secondary school teachers thought that when disclosing the size of clothes that a student wears and their marks, that they had to obtain the students' consent.

On the other hand, teachers of both groups pointed out some ways that they or their schools respect their students' privacy.

Ways mentioned by the primary school teachers on respecting their students' privacy:

- i. Teachers usually cover the marks of the student so that they cannot see the marks of others when checking scores/marks with their teacher.
- ii. Teacher usually cut away the parents' information from the handbook if they need to submit a copy of the handbook for competition applications.
- iii. Schools request parents to fill in consent forms to confirm whether they agree to disclosing or posting students' personal data (e.g. class video recording) online.

Ways mentioned by the secondary school teachers on respecting their students' privacy:

- i. Schools keep the profiles of old students by wrapping them with plastic wrap.
- ii. Schools normally remind teachers to destroy notices or documents with personal information at the end of the school term.
- iii. During open days, schools request teacher put books and exercises in the staffroom and that they should not let others read them.
- iv. Teachers do not read out the marks of students in class.
- v. Schools chop "confidential" on the list of students with SEN.
- vi. Teachers try not to let students know the identities of NCSs.
- vii. Only designated staff can access the results of curriculum tailoring and assessment.

- viii. In suspected theft cases, teachers might request students to remove all their belongings and check their school bags. Students who do not and object can request the search to be conducted in the presence of their parents.

In order to maintain discipline, a few secondary school teachers reported that they or their school did not respect students' privacy:

- i. A complaint was lodged by a parent that a conversation between teachers regarding the performance of a student was overheard on the telephone. This led to the school setting up three rooms for teachers to use to talk with parents.
- ii. There was a case that a teacher who was leaving the school threw all notices containing students' personal information into rubbish bins.
- iii. Handling data is risky as sometimes they might have to carry USBs with private information (e.g. names, contact information) when leading activities and they have to be very careful not to lose it.
- iv. In some cases there are no guidelines provided by the school regarding the access and storage of the personal data.
- v. There could be a chance that teachers ask students to take out all their belongings from their school bags to check if there is a theft.
- vi. If necessary, teachers could ask to check the messages on students' mobile phones to confirm if the students had been using them in school.

Perceived Privacy Concerns & Risks Faced By Children

It is agreed by teachers that students at higher levels (primary 4 or above) are more aware of privacy problems. In fact, a few primary school teachers stressed that their students are alert and would not easily disclose personal data to strangers. A few also claimed that there might be a chance that students are not aware of privacy problems and therefore do not know how to protect their privacy. In addition, some indicated that the possibility of losing their handbook is a privacy risk faced by their students as it contains personal data of both the student and their parents.

A few secondary school teachers indicated the possibility of losing student ID cards is also a privacy risk faced by their students as they bear the students' name, basic school information and a photo, and if someone picked up a lost student ID card, they may impersonate the student. Some agreed that there might be risk if people discover the identity and background of student's on Facebook. A few also mentioned that any inappropriate behaviour in public areas might be posted on Facebook or discussion forums. A few stated that they had been added to WhatsApp groups unintentionally resulting in the data of the students being leaked.

Engagement In Privacy Intrusive Activities & Reasons

Most teachers of both groups indicated that CCTVs were installed in public area in their schools, including corridors, canteens, and courts, and they claimed they were easy to see.

All teachers claimed that schools did not ask for students' consent before installing the CCTV, while some indicated that schools displayed notices to indicate the system was in operation

Some primary and secondary school teachers mentioned that only restricted staff could view the CCTV records and that they do not know who has the right to review the CCTV records (e.g. couriers). A few also indicated that CCTV had been installed in the staffroom and school general office, however, a few expressed concerns about the exposure of personal data contained within the CCTV records as they usually handled students' personal data in the staffroom.

A few primary school teachers added that viewing the CCTV in the school general office might allow staff and even students to access it, while some mentioned that the CCTV footage of counselling rooms could only be accessed by designated staff and that a password is required.

Some secondary school teachers indicated that CCTV is installed in the counselling rooms at their school; while a few also claimed that CCTV is installed in staffrooms as well as the computer rooms. A few pointed out that some of the CCTVs were not operational and were only installed to create a deterrent effect.

All teachers of both groups expressed that privacy concern is not significant if CCTV cameras are installed in public areas and that students are more restrained in front of them.

Perceived Right To Violate Privacy

All teachers of both groups agreed that schools need to know whenever it is necessary to violate their students' privacy (e.g. counselling, discipline, extracurricular activities).

However, a few secondary school teachers pointed out that their school had no guidance in place to advise teachers on how to handle the personal data of their students (e.g. who could access the personal data, the types of personal data that could be disclosed).

Right Given To Children To Object To The Disclosure Of Personal Data

Teachers indicated that they have to know the background of students whenever it is necessary. The data includes students' mobile phone numbers, parents' mobile phone numbers, personal lives outside of school, parents' HKID and birth certificates.

Scenarios mentioned by a few secondary school teachers that allow students the right to refuse:

- The school developed a system which sends an SMS message to parents regarding their child being absent from school as well as if they failed to submit

assignments. Students and parents could choose not to receive this SMS message.

When a teacher reads out the scores, students could raise their hand and object to their score being disclosed.

Confidence In Supporting Children With Privacy Problems

Most of the teachers of both groups indicated that they or their schools did not provide support to students on privacy protection. In fact, they felt that the more students knew about their privacy right, the more restrictions would be imposed on schools as they might engage in privacy intrusive acts.

On the other hand, a few teachers indicated that professionals had come to their school on staff development days to teach the staff on how to handle and destroy documents containing personal information or not to disclose students' work containing marks or comments. Cyberbullying was also one of the topics discussed and a few also claimed that there were notes relating to managing privacy problems in the teachers' handbook.

Measures Adopted To Protect Children's Privacy

Teachers of both groups mentioned some specific measures to protect the privacy of children in school:

Measures mentioned by primary school teachers:

- i. Folders on computers could only be accessed by authorised people only (e.g. English teachers could only assess folders related to English subjects).

Measures mentioned by secondary school teachers:

- i. Teachers have to set passwords for files with sensitive information (e.g. SEN).
- ii. Class teachers only know the students or parents' contact numbers of their own class. To prevent disclosure of personal data, only class teachers could obtain/access information relating to the addresses of their students. Non class teachers who wish to access the personal data of the students must obtain approval from the discipline teacher.
- iii. School servers should be protected by security (e.g. firewalls).

Part II – In-depth Interviews

This section summarises the findings according to the objectives and themes identified from the results of in-depth interviews.

(i) Involvement Of NGOs In Child Privacy

It was found that due to the different focuses of work, the involvement in child privacy differs across the interest groups.

| Objectives & Nature Of Services Provided | Service Target | Involvement In Child Privacy |
|--|---|---|
| <p>1. The Hong Kong Committee on Children’s Rights</p> <p>The organisation is set up to promote children’s rights, one of which is privacy. The organisation promotes children’s right through talks, training, exhibitions and other activities.</p> | <ul style="list-style-type: none"> • Mainly children aged under 18 | <ul style="list-style-type: none"> • Delivers talks in schools about children’s rights (privacy is one of the children’s rights). • If there is a serious children’s rights issue (including privacy), they will inform the media so as to address the issue. |
| <p>2. The Hong Kong Federation of Youth Groups</p> <p>The organisation is one of the largest youth organisations in Hong Kong and provides a wide range of services, including counselling, leadership training, volunteer service, employment platforms and youth research.</p> | <ul style="list-style-type: none"> • General public aged 6-35, parents and schools | <ul style="list-style-type: none"> • No specific/designated programmes concerning child privacy, but handles and processes clients' personal data when delivering counselling services and programme enrolment. • Sets up exhibition boards in youth centres and stalls with game activities held in the community (e.g. estate shopping centres), however, the above are not regular activities. • Delivers Internet education programmes (e.g. talks |

| Objectives & Nature Of Services Provided | Service Target | Involvement In Child Privacy |
|---|---|---|
| | | <p>and activities) to students. Topics cover cyberbullying and the protection of privacy.</p> <ul style="list-style-type: none"> • Works with the PCPD to promote child privacy (e.g. broadcasting PCPD videos and organising discussion forum within the media platform of their website). • Carries out educational programmes by school social workers each year. Topics are wide ranging and subject to schools' request. Privacy can be one of the topics. • Organises talks (e.g. online, privacy) for parents in schools. • Provides counselling online. |
| <p>3. Federation of Parent-Teacher Associations, Southern District, Hong Kong</p> <p>The organisation acts as a bridge between parents, students and teachers to promote parent education and home-school cooperation. Their main task is to carry out activities within their own districts.</p> | <ul style="list-style-type: none"> • Students of kindergarten, primary schools and secondary schools, and their parents. | <ul style="list-style-type: none"> • No particular activities carried out for the purpose of promoting child privacy. |

| Objectives & Nature Of Services Provided | Service Target | Involvement In Child Privacy |
|---|---|---|
| <p>4. Hong Kong Family Welfare Society</p> <p>The organisation provides the following services:</p> <ul style="list-style-type: none"> - youth services (the target group is children aged 6-24) - social work services in schools (about 40 secondary schools in Hong Kong) - family services (six service centres) | <ul style="list-style-type: none"> • Children and their family members | <ul style="list-style-type: none"> • Provides Internet education and counselling services (e.g. Internet addiction, cyberbullying) • Cooperates with Hong Kong’s Education Bureau to set up hotlines to answer public enquiries • Organises talks for teachers, students and parents (Topics include healthy use of the Internet, cyberbullying, installation of filtering software and how to respect others’ privacy by youngster). Talks are organised every month. • Handles data access requests submitted by parents to obtain the personal data of their children. |

(ii) Child Privacy Situation In Hong Kong

The majority of the interviewees commented that the situation of child privacy has improved. One of the reasons is the existence of the Personal Data (Privacy) Ordinance in Hong Kong. Interviewees stated that the following incidents revealed that children had become more aware of their privacy rights:

- i. refusal to disclose information concerning themselves and their family members when asked.
- ii. awareness of the conditions set out before downloading mobile applications.

Despite it being generally viewed that awareness of privacy among children has increased, awareness of this topic is seen to increase with age, therefore, young children still need guidance by their parents and teachers to protect their personal information. Furthermore, one interviewee indicated that children show little respect for the privacy of others, for instance, a student posted a friend's photo on a discussion forum which invited others to comment on the appearance of the friend.

The majority of the interviewees particularly expressed concerns about online privacy and viewed that children's awareness of privacy online is low. According to the interviewees, children do not mind disclosing their personal data, such as photos and information of their family members, on Facebook. Children are also seen not think carefully before giving their contact numbers to others on the Internet and easily post personal information in discussion forums. These incidents revealed that children are not cautious enough and can leak their personal information online easily.

One of the interviewers stated that parents are always given authority to give consent or make decisions on behalf of their children, particularly for those who are below 18 years of age. It seems that adults always make decisions based on administrative convenience rather than having considered the rights and benefits of their children (e.g. drug test issue, students' strike.) Interviewee viewed that the views of the parents may not always represent the genuine view of the children, and therefore, it is unfair on the children.

The interviewees mentioned some privacy-related cases which they have encountered:

- i. A School headmaster may wish to know the problems encountered by their students. Some of them may request school social workers to provide a list, showing students' names and the nature of the problem for their follow up. The organisation understands that the school headmaster hopes to identify students' needs and render suitable services to them, but school social workers should not disclose such information unless consent from the clients has been obtained. As such, the organisation could only provide the nature and the number of problems on the case list provided to the school headmaster.

- ii. The organisation encounters a difficulty in striking a balance between handing data access requests submitted by the parents and protecting the privacy of the children by welfare organisations. The current practice of the organisation is to obtain consent from the children first before providing information to the parents. There is a gap that the organisation is required to comply with the legal requirements to provide personal data to parents, but at the same time, the welfare organisation should protect the child's privacy. The interviewee stated that support to the welfare organisations is insufficient.

(iii) Education Received Concerning Privacy

Only one interviewee claimed that children have been effectively educated about privacy over the last 5-6 years. The interviewee stated that most children should have heard about security issues relating to privacy when using mobile phones and Facebook. Children and teenagers have also been advised that one of the methods used to secure their data privacy is to not disclose their personal data to strangers. In general, children should start to be alert about privacy issues.

The majority of the interviewees thought that children are not effectively educated about privacy and that one of the reasons is that schools, teachers and parents attribute low priority to privacy. These stakeholders are more concerned with academic related issues, such as schools assessments, school selection or project learning, and preferred to allocate more time and resources to these areas. For instance, one interviewee mentioned that schools could only afford time to organise a talk with a section about privacy once a year.

Privacy is not a topic that exists within the school curriculum, therefore; children may not be able to obtain privacy related information. One interviewee even commented that there is no constructive atmosphere for discussing this topic and found that schools are reluctant to teach students about this. Therefore, it is generally viewed that children are not effectively educated about privacy.

(iv) Suggestions To improve The Current Situation Concerning Child Privacy

During the in-depth interviews, suggestions were given to PCPD, the Education Bureau (EDB) and schools to improve the current situation:

PCPD:

- i. To strengthen education and promotion
 - Organise activities (e.g. seminars for parents and children) and design publications that target children.

- Produce publications for teachers and schools.
 - Use more channels (e.g. TV Announcements in the Public Interests (APIs), billboard advertising on public transport)
- ii. To facilitate complaints made by children
 - Adopt the Equal Opportunities Commission's complaint handling method.
 - Self-initiate investigations on child privacy infringement cases instead of relying on children to submit a complaint.
 - iii. To provide more support to organisations, particularly NGOs
 - Help organisations to set up policies related to child privacy.
 - Organise training to teach staff how to handle dilemmas between respecting privacy and the right to access to information by stakeholders.

Education Bureau:

- i. To identify major privacy related topics and add them into the curriculum (e.g. Information Technology, Liberal Studies, General Studies), and clearly define the details (e.g. number of teaching hours, qualifications of the teaching staff).
- ii. To conduct talks on the types of personal data that can or cannot be posted online.

Schools:

- i. To add privacy into the curriculum of Liberal Studies or General Studies in primary and secondary schools.
- ii. To provide training on child privacy on staff development days at schools.
- iii. To partner with PCPD or other NGOs in carrying out activities.
- iv. To produce a CD which act as a teaching aid for parents.

Interviewed Organisations:

- i. Cooperate with the PCPD to organise seminars or activities.
- ii. Continue to provide talks to educate youngsters on child privacy.
- iii. Provide comments and suggestions to the PCPD when appropriate.
- iv. Review the policy and practices of the organisation.

(v) Perceived Child Privacy Problems In Hong Kong In The Future

Some interviewees thought that the child privacy problems would become more serious in the future, particularly online privacy. Children, even as young as kindergarten students, have started to use the Internet for homework, playing games or communicating via social media. In addition, the development of new media (e.g. Internet refrigerators, Google glasses) poses a threat to data privacy. Interviewees added that mobile

applications always request excessive information from the users. Children are also now active users of information communication technology and this exposes a higher risk to disclose their personal information online rather than offline.

One interviewee claimed that under the current political atmosphere, those children who speak up in public will have no privacy. For example, one child was followed by others and that their detailed information made known to the general public.

Despite the above, one interviewee believed that the general public will accord higher priority to privacy, similar to environmental protection, due to the development of technology and that people will also become more aware of child privacy in the future.

Part III – Comparison Of Major Findings

This section shows different views of stakeholders (e.g. children, parents and teachers).

(i) Information Considered To Be Private & The Stakeholders That Wish To Know It

Both junior and senior secondary school students were able to highlight some data which they consider to be private and would not want others to know. Parents are more concerned by the social networks of their children which are perceived as private by the senior secondary school students. On the other hand, teachers need to know comprehensive private information about their students, including their detailed family background (e.g. the financial and marital status of their parents) and private information (e.g. social networks) which are also perceived as private issues by the secondary school students.

The results are highlighted as follows.

Table 3: Comparison of the data that students perceived as private, as well as the data that parents and teachers want to know

| Type Of Student | Data Students Perceived As Private | Data Parents Want To Know | Data Teachers Want To Know |
|-----------------------------------|---|---|--|
| Kindergarten students | NA | <ul style="list-style-type: none"> • Academic performance • Misbehaviour of children in school | NA |
| Primary school students | NA | <ul style="list-style-type: none"> • The content of discussions with classmates | <ul style="list-style-type: none"> • Students' names, HKIDs, residential addresses, students' height and weight, parents' names and contact information, parents' occupations • Whether parents are divorced and the custody arrangements of the student |
| Secondary school students (F1-F3) | <ul style="list-style-type: none"> • Names, HKIDs, mobile phone numbers, dates of birth, residential addresses, family members' information, email addresses, Facebook passwords, personal as well as family | <ul style="list-style-type: none"> • Children's social networks • Content of discussions among children and friends | |

| Type Of Student | Data Students Perceived As Private | Data Parents Want To Know | Data Teachers Want To Know |
|-----------------------------------|---|---------------------------|---|
| | financial situation and medical history | | |
| Secondary school students (F4-F6) | <ul style="list-style-type: none"> • Names, HKIDs, residential addresses, mobile phone numbers, the places that they have been, family background, home telephone numbers, bank account numbers and passwords • Discussion content with friends and social networks | | <ul style="list-style-type: none"> • Whether parents need to work outside of Hong Kong and who takes care of the student. • Family’s financial situation (e.g. whether they receive CSSA). • Students’ health condition (e.g. whether the student is sensitive to any type of food). • Special needs of the student (e.g. Students with Special Educational Needs (SEN) including attention deficit hyperactivity disorder or autism, non-Chinese speaking (NCS) students). • Lives of students outside school (e.g. whether students have part-time jobs, are dating) |

(ii) Awareness Of Privacy

Results reflected that the awareness of privacy for some students is low and the perceived degree of privacy of the personal data varies between different students. Most parents who participated with younger children reflected that their children are not aware of privacy risks and are not able to protect their own privacy. Based on the opinions of parent groups, students from higher forms are more aware of the privacy issue. Like the parent groups, teachers agreed higher level students are more aware of privacy issues. However, both parent and teacher participants also mentioned some students are not aware of the privacy problems and therefore do not know how to protect their privacy.

The results are highlighted as follows.

Table 4: Comparison of children’s awareness of privacy between students, parents and teachers

| Type Of Student | Children’s Awareness Of Privacy – Students’ Perspective | Children’s Awareness Of Privacy – Parents’ Perspective | Children’s Awareness Of Privacy – Teachers’ Perspective |
|------------------------|--|---|--|
| Kindergarten students | NA | <ul style="list-style-type: none"> • Children’s awareness of privacy is low • Easily disclose personal data to strangers, such as their address • Photos and videos have been taken in school by parents and are posted on Facebook • Parents may talk about the behaviour or performance of other children to others by disclosing their names | NA |

| Type Of Student | Children’s Awareness Of Privacy – Students’ Perspective | Children’s Awareness Of Privacy – Parents’ Perspective | Children’s Awareness Of Privacy – Teachers’ Perspective |
|-----------------------------------|--|--|--|
| Primary school students | NA | <ul style="list-style-type: none"> • Children’s awareness of privacy is low • Not able to protect their privacy | <ul style="list-style-type: none"> • Higher level students are more aware of privacy problems • Some students are not aware of privacy problems and therefore do not know how to protect their privacy |
| Secondary school students (F1-F3) | <ul style="list-style-type: none"> • Agree for peers to post group photos without seeking consent as they do not have much concern about privacy • Want their friends to obtain their agreement before posting personal data, photos and videos • Obtain peers’ consent before posting their photos and videos on social networking sites • Have disputes about the sensitivity between Facebook passwords and telephone numbers • Be aware of privacy problems when using Twitter and Facebook | <ul style="list-style-type: none"> • Most found their children were aware of privacy risks/problems • Not able to protect their privacy • A few thought the current generation does not think that their personal data has to be protected and the impact of disclosing personal data to others | |
| Secondary school students (F4-F6) | <ul style="list-style-type: none"> • Agree for peers to post group photos without seeking consent • Allow peers to upload their personal data , photos and videos if they obtain permission first • Only a few would get their peers’ | | |

| Type Of Student | Children’s Awareness Of Privacy – Students’ Perspective | Children’s Awareness Of Privacy – Parents’ Perspective | Children’s Awareness Of Privacy – Teachers’ Perspective |
|-----------------|---|--|---|
| | <p>consent before posting their personal data and videos on social networking sites</p> <ul style="list-style-type: none"> • Mentioned that mobile phone numbers, bank account numbers, residential addresses and their whereabouts are of a high degree of sensitivity • Awareness of behavioural tracking by the website operator to build profiles for advertising and have concerns about being tracked • A few are aware of being tracked by YouTube and Facebook, but they do not worry because of the convenience and the recommendations | | |

(iii) Respect Of Privacy

Generally, students found parents and teachers respect their privacy, but relatively more peers do not respect students’ privacy. All parent participants claimed that they respect their children’s privacy and their children have the right to refuse to disclose their personal data. However, parents of younger children reflected that they want to know more about their children due to their age. Teachers also respect students’ privacy unless in situations when they have to handle discipline problems.

The results are highlighted as follows.

Table 5: Comparison of respect issues of privacy between students, parents and teachers

| Type Of Student | Respect Of Privacy – Students’ Perspective | Respect On Privacy – Parents’ Perspective | Respect Of Privacy – Teachers’ Perspective |
|-------------------------|---|--|--|
| Kindergarten students | NA | <ul style="list-style-type: none"> • Showed respect for the privacy of children (e.g. not posting photos of children showing the private areas of their bodies) • One indicated they cannot let their children to refuse to disclose personal data to them at this moment • All thought they have no right to violate their children’s privacy. However, if their children are young, parents may want/need to know more about their children to make decisions which are in their best interest • Difficult to ask their children’s approval as they are incapable of comprehending the questions or situations | NA |
| Primary school students | NA | <ul style="list-style-type: none"> • Showed respect for the privacy of children (e.g. allow children to say no when they have something | <ul style="list-style-type: none"> • To keep good discipline of their students, teachers should be reported if they or their school |

| Type Of Student | Respect Of Privacy – Students’ Perspective | Respect On Privacy – Parents’ Perspective | Respect Of Privacy – Teachers’ Perspective |
|-----------------|--|---|--|
| | | <p>they do not want to reveal, look at their mobile phones together with their children if they really want to know more from their children)</p> <ul style="list-style-type: none"> • Some perform respect activities, (e.g. only allow children to use WhatsApp in a specific areas and at specific time for monitoring, read child’s diary) • All thought they give their children the right to refuse to disclose their personal data to them as they will not force their children to tell them • All thought they have no right to violate their children’s privacy • Agreed they should have the right to violate their children’s privacy when it involves offences, if there is a risk faced by their children, if their children are too young and their psychological development is not mature enough | <p>does not respect students’ privacy</p> <ul style="list-style-type: none"> • All agreed schools need to know the personal data and background information whenever it is necessary • Allow students have the right to refuse in some scenarios (e.g. students and parents can choose not to receive an SMS message concerning attendance records, students can object to disclosing their scores when the teacher reads read them out) • One pointed out the school offers no guidance for advising teachers on how to handle the personal data of the students |

| Type Of Student | Respect Of Privacy – Students’ Perspective | Respect On Privacy – Parents’ Perspective | Respect Of Privacy – Teachers’ Perspective |
|-----------------------------------|--|---|--|
| Secondary school students (F1-F3) | <p><u>At home/with parents</u></p> <ul style="list-style-type: none"> • Most found parents respect their privacy • One emphasised they should have the right to refuse to disclose his friends’ contact information and addresses to their parents • All agreed parents should know their private information including the time they go home and their itinerary when they are late to return home because of safety <p><u>At school/with teachers</u></p> <ul style="list-style-type: none"> • All found their teachers respect their privacy • All agreed they have no right to refuse their school the right to collect and disclose their personal data to others <p><u>With peers</u></p> <ul style="list-style-type: none"> • Some peers do not respect others’ privacy (e.g. reading WhatsApp messages on their mobile phones, | <ul style="list-style-type: none"> • Showed respect for the privacy of their children • All emphasised no chance for parents to give their children the right to refuse to disclose their personal data to them as they have no means to force their children to disclose any private information • The majority thought whether they have the right to violate their children’s privacy depends on the situation and the age of the child • No one installed surveillance systems at home or on their computer. • All “friends” of their children on Facebook even their children’s friends, teachers and the parents of their children’s friends | |

| Type Of Student | Respect Of Privacy – Students’ Perspective | Respect On Privacy – Parents’ Perspective | Respect Of Privacy – Teachers’ Perspective |
|-----------------------------------|--|---|--|
| | seeing applications and photos albums on their mobile phones) | | |
| Secondary school students (F4-F6) | <p><u>At home/with parents</u></p> <ul style="list-style-type: none"> • A few claimed parents do not respect their privacy • One pointed out when students reach the age of 18, they should have the right to refuse to disclose personal data to parents • All agreed parents should know their private information if they go out late at night or go to a place which is perceived to be dangerous (e.g. hiking, joining Occupy Central protest) <p><u>At school/with teachers</u></p> <ul style="list-style-type: none"> • A few found teachers do not respect their privacy <p><u>With peers</u></p> <ul style="list-style-type: none"> • All agreed their peers respect their privacy | | |

(iv) Consent

Three groups of participants had different views concerning consent issues. Most of the student participants obtain consent from their peers before posting personal information on the websites; however, all parent participants of kindergarten and primary school students and teacher participants agreed that they do not have to obtain consent from the children before collecting and using their personal information generally.

The results are highlighted as follows.

Table 6: Comparison of views concerning consent issues between students, parents and teachers

| Type Of Student | Views On Consent Issues By Students | Views On Consent Issues By Parents | Views On Consent Issues By Teachers |
|-----------------------------------|---|---|---|
| Kindergarten students | NA | <ul style="list-style-type: none"> All think it is not necessary to obtain consent from their children as they are just kindergarten students and they are not aware of their consent rights Only one agreed consent should be obtained from the children before collecting and using their personal data | NA |
| Primary school students | NA | <ul style="list-style-type: none"> Do not obtain consent from the children before collecting and using their personal data due to their age | <ul style="list-style-type: none"> All agreed they do not need to obtain consent from their students because they consider that parents have already agreed in forms, notices and/or handbooks distributed at the beginning of the |
| Secondary school students (F1-F3) | <u>At school/with teachers</u> <ul style="list-style-type: none"> All mentioned that their schools | <ul style="list-style-type: none"> All agreed consent should be obtained from the children before | |

| Type Of Student | Views On Consent Issues By Students | Views On Consent Issues By Parents | Views On Consent Issues By Teachers |
|--|---|---|--|
| | <p>do not collect fingerprints</p> <p><u>With peers</u></p> <ul style="list-style-type: none"> • Most obtain their peers' consent before posting their photos and videos on social networking sites • If their peers ask for a photo to be deleted, they usually respect their the request | <p>collecting and using their personal data</p> | <p>school term to use the students' personal data</p> <ul style="list-style-type: none"> • Primary school teachers tend to view that students are too young and they do not care/mind how the schools or teachers collect and use their personal data |
| <p>Secondary school students (F4-F6)</p> | <p><u>At school/with teachers</u></p> <ul style="list-style-type: none"> • All mentioned that their schools do not collect fingerprints. • All agreed schools should consult with them before installing CCTV systems in schools and classrooms <p><u>With peers</u></p> <ul style="list-style-type: none"> • Only two will obtain their peers' consent before posting their personal data and videos on social networking sites | | |

(v) Perceived Privacy Risks & Problems

After understanding the views of different target groups, it was found that students have concerns about privacy at school and among peers, but less at home. Children may be faced with risks due to some of the practices conducted by their parents and teachers. In particular, participants thought that privacy concern is not significant if CCTV cameras are installed in public areas and that students are more restrained in front of CCTV cameras. In addition, teachers may add their students on Facebook to know about their lives outside of school. The results are highlighted as follows.

Table 7: Comparison of children’s perceived privacy risks and problems by students, parents and teachers

| Type of Student | Privacy Risks & Problems Perceived By Students | Perceived Privacy Risks & Problems By Parents | Perceived Privacy Risks & Problems By Teachers |
|-------------------------|--|--|--|
| Kindergarten students | NA | <ul style="list-style-type: none"> • Indicated their children should be always accompanied by adults (e.g. domestic helpers, relatives, parents) • Contact school to know the whereabouts of their children if necessary • A few communicate over WhatsApp or over the telephone with their family members to know the location of their children | NA |
| Primary school students | NA | <ul style="list-style-type: none"> • All know their children’s location by calling their children or family members by telephone | <ul style="list-style-type: none"> • All claimed their schools collect nearly all personal information by asking parents to fill in forms |

| Type of Student | Privacy Risks & Problems Perceived By Students | Perceived Privacy Risks & Problems By Parents | Perceived Privacy Risks & Problems By Teachers |
|-----------------------------------|--|--|--|
| Secondary school students (F1-F3) | <p><u>At home/with parents</u></p> <ul style="list-style-type: none"> • Most do not have concerns about privacy at home • A few expressed their major concern is private data contained on mobile phones (e.g. recorded voice messages, discussion records on WhatsApp) <p><u>At school/with teachers</u></p> <ul style="list-style-type: none"> • A few indicated it is not a big problem if only their name and their photo is posted on the Internet by their school • Do not think class allocation results on noticeboards posted by schools is sensitive data • All do not have concerns about being videotaped by CCTV in schools <p><u>Online/with peers</u></p> <ul style="list-style-type: none"> • All agreed there is no problem with being posted in a group photo online | <ul style="list-style-type: none"> • Most mainly use WhatsApp to contact their children • A few contact them directly by telephone | <p>and/or notices at the beginning of school terms when students start to study at their school</p> <ul style="list-style-type: none"> • A few indicated they know students information by talking to them and reading their Facebook or WhatsApp messages • Mentioned they can access WebSAMS (Web School Administration and Management System) to obtain detailed information about students • Expressed privacy concern is not significant if CCTV cameras are installed in public areas, but that students are more restrained in front of the CCTV cameras |

| Type of Student | Privacy Risks & Problems Perceived By Students | Perceived Privacy Risks & Problems By Parents | Perceived Privacy Risks & Problems By Teachers |
|-----------------------------------|---|---|--|
| Secondary school students (F4-F6) | <p><u>At home/with parents</u></p> <ul style="list-style-type: none"> • Most do not have concerns about privacy at home <p><u>At school/with teachers</u></p> <ul style="list-style-type: none"> • Some have concerns about personal data being leaked by their school (e.g. data stored on networked computers, practices in schools) • Do not have too many concerns of CCTV videotaping them as they are mainly installed for security reasons <p><u>Online/with peers</u></p> <ul style="list-style-type: none"> • Some expressed they do not want their peers to know some personal data | | |

(vi) Use Of ICT & Social Networks

All student, parent and teacher participants are active users of ICT. Parents are active users of Facebook and WhatsApp. They post photos of their children on Facebook and also share those photos via communication applications. It was also found that schools post children’s allocation information on their websites as teachers think the information is not that sensitive. Parents are aware of the social networks of their children by various methods, and usually in person.

Table 8: Comparison of the use of ICT and social network between students, parents and teachers

| Type Of Student | Use Of ICT & Social Networks By Students | Use Of ICT & Social Networks By Parents | Use Of ICT & Social Networks By Teachers |
|------------------------|---|--|---|
| Kindergarten students | NA | <ul style="list-style-type: none"> • Major types of data being disclosed through the use of ICT: photos, videos, behaviour/activities of their children through Facebook • Some communicated with friends and parent groups over WhatsApp and shared photos • Some will discuss with their children at home about their friends from school • Some mentioned that they know their children’s social networks through school activities such as picnics and birthday parties, WhatsApp groups created by parents, bringing them to school | NA |

| Type Of Student | Use Of ICT & Social Networks By Students | Use Of ICT & Social Networks By Parents | Use Of ICT & Social Networks By Teachers |
|-----------------------------------|--|--|--|
| | | <p>or picking them up from school, observing them outside of the classroom and by talking to their teacher</p> | |
| Primary school students | NA | <ul style="list-style-type: none"> • A few have posted photos of their children on Facebook such as awards, certificates, travelling, gatherings, birthdays and even wearing school uniform. • Most share the computer with their children at home • Some mentioned their children told them actively about their social networks and some by asking them directly or via the parents' WhatsApp group | <ul style="list-style-type: none"> • Some claimed results of class allocation information is posted on their website and noticeboards at school so that others can see what is not too sensitive • Some schools obtained consent from the students by asking them to sign consent forms regarding the posting of their name, class, class number and photo onto the schools website • A few indicated they will follow up with students if they discovered any delinquent behaviour on Facebook, (e.g. using foul language, bullying) |
| Secondary school students (F1-F3) | <ul style="list-style-type: none"> • Be aware of privacy problems that occur by using Twitter and Facebook • A few were aware of being tracked by YouTube and Facebook, but are not worried because of its convenience and the good recommendations made | <ul style="list-style-type: none"> • Some post photos on Facebook and a few share photos on WhatsApp • Two indicated their children have requested them not to post any of their photos on Facebook • All agreed they do not disclose | |

| Type Of Student | Use Of ICT & Social Networks By Students | Use Of ICT & Social Networks By Parents | Use Of ICT & Social Networks By Teachers |
|-----------------------------------|--|---|--|
| | by the websites | their children's school information (e.g. ranking in class) through ICT channels | |
| Secondary school students (F4-F6) | <ul style="list-style-type: none"> • All were aware of behavioural tracking by the website operators to build profiles for advertising and were concerned about being tracked | <ul style="list-style-type: none"> • Most have registered Facebook accounts for their children or together with their children • Some know their children's Facebook and email passwords • Some mentioned their children proactively tell them about their social networks | |

(vii) Support To Children Concerning Privacy

Results showed that parents, teachers and schools seldom provide support to children about privacy protection. Most parents have no idea on how to support their children to manage privacy problems. The teacher participants even reflected that schools do not really like to teach students about privacy issues because the schools may engage in privacy intrusive acts themselves.

Table 9: Comparison of support received by students as well as support provided by parents and teachers

| Type Of Student | Support Received By Students | Support Provided By Parents | Support Provided By Teachers |
|-----------------------------------|--|---|--|
| Kindergarten students | NA | <ul style="list-style-type: none"> • A few do not have confidence in supporting children to manage privacy problems • A few have an idea how to tell children not to show their body, disclose their personal information to the others | NA |
| Primary school students | NA | <ul style="list-style-type: none"> • Mentioned they can support their children to manage personal data | <ul style="list-style-type: none"> • They or their schools do not provide support to students concerning privacy protection • Schools may engage in privacy intrusive acts, therefore they do not really like to teach their students about this |
| Secondary school students (F1-F3) | <p><u>At home/with parents</u></p> <ul style="list-style-type: none"> • Parents do not provide guidance on privacy protection <p><u>At school/with teachers</u></p> <ul style="list-style-type: none"> • Limited education and support provided by schools | <ul style="list-style-type: none"> • Do not know how to support their children to manage privacy problems | |

| Type Of Student | Support Received By Students | Support Provided By Parents | Support Provided By Teachers |
|-----------------------------------|---|-----------------------------|------------------------------|
| Secondary school students (F4-F6) | <u>At home/with parents</u> <ul style="list-style-type: none"> • A few indicated parents provide guidance on privacy protection <u>At school/with teachers</u> <ul style="list-style-type: none"> • Do not find schools provide any support on privacy protection | | |

4. Conclusion

Child Privacy In Hong Kong

A few representatives of NGOs claimed that the child privacy situation has improved as there is now ordinance relating to privacy in Hong Kong and that students have more knowledge on personal information and private family information. It is reflected that the situation of child privacy is not fair for children who are under 18 years of age as many things require their parents' consent.

This belief is also supported by the results of the focus groups. It seems that parents with younger children believe they need to know as much personal information as possible so that they can make decisions and provide guidance to their children. It is a similar situation in schools as teachers believe they and the schools have to know detailed family background, personal information and the social networks of their students, especially those related to discipline issues and special educational needs. Parents and teachers, though, claimed that even though it is reasonable to obtain the private information of their children, it is still doubtful whether some intimate details of children's personal information has to be disclosed to their parents or teachers and schools.

Awareness Of Child Privacy

Some representatives of NGOs claimed that the awareness of children concerning child privacy online is low. Children are unaware about the child privacy issue and they do not mind sharing all their personal information on Facebook. They will also put private photos and family information on Facebook; therefore, they are not able to protect their privacy. In addition, children easily leak their personal information online, but they will not disclose any personal information during their daily lives. They will not think before giving their contact numbers to others on the Internet and will easily disclose personal information in discussion forums.

The results are similar to what were obtained from the focus group interviews as it was found that students know how to protect their own privacy, but they will not protect the privacy of the others (e.g. posting their peers' photos and videos and also group photos without their consent). They will also leak other people's information on the Internet. Some students thought that information (e.g. birthday) shown on Facebook and even Facebook passwords are not important. It is viewed that children do not have much concern and awareness about Internet security.

Recommendations

Based on the results of the focus group interviews with stakeholders and in-depth interviews with NGOs, the following insights have been generated:

- i. Knowledge and concepts on privacy have to be delivered and discussed at an earlier stage of schooling (e.g. kindergarten and primary school) as younger children are less concerned about privacy and the related protection measures;
- ii. Add sections/topics related to privacy issues and measures of privacy protection into the Information Technology curriculum;
- iii. Strengthen the communication between parents and teachers/schools to handle privacy issues of children;
- iv. Promote privacy and security issues when using the Internet, social networking websites and mobile phone to students, parents and teachers;
- v. Advertise messages concerning child privacy by different channels (e.g. using billboard advertising on public transportation, TV advertisements);
- vi. Conduct seminars or promotions related to child privacy at all levels of schools to students, parents and also teachers;
- vii. Help schools or organisations set up policies and measures related to child privacy to prevent the over-collection and exposure of children's personal data.

5. Limitations

Since only one focus group interview was conducted for each participant category, the study was not able to address extensive opinions from participants who have different backgrounds (e.g. school, age, living standard). It is suggested to hold additional focus group interviews for the same participant categories to increase the sample size of the survey.

Focus group interviews were not conducted with primary school students in this study as they were unable to attend the interview; therefore, the focus group interview was cancelled. The study did not include personal comments from primary school students and instead relied on parents and teachers to provide their understanding on the primary school children's behaviour.

Appendix I: Questions For Focus Groups With Stakeholders

A. Focus Group Guidelines for Students

Briefly introduce the concept of “personal data” under the Personal Data (Privacy) Ordinance (PDPO) to the students at the beginning of the discussion.

Q1. What information do you regard as personal data?

[Check what they mention: Full name, age, date of birth, mobile phone number, address, email address, Hong Kong Identity Card , marital status, occupation/position, salary, personal financial situation, medical records, employment record, educational attainment, academic performance, weight, size of bust/waist and hip, sexual orientation, relationship status, network of friends and religion.]

Q2. Can you state what degree of sensitivity/privacy you ascribe to for the data mentioned?

PCPD’s comment: Briefly introduce the concept of “personal data” under the PDPO to the children after asking Q2.

At Home

Q3. What type of personal data do you not want your parents to know?

Q4. At home, do you have any concerns about privacy?

Q5. Do you find your parents respect your privacy?

- If yes, in what ways?

- e.g.
- a. Check call records
 - b. Share pictures without prior consent
 - c. Post personal data (e.g. photos and videos) online
 - d. Track your location
 - e. Check text messages on your mobile phone
 - f. Search lockers and drawers
 - g. Read personal letters/emails

- If no, what experiences relating to invasion of privacy by parents do you have?

- How often do you feel that your parents invade your privacy? If yes, in what ways?

-What was your response at the time?

Q6. Under what circumstances should your parents be allowed to violate your privacy?

Q7. Are there any circumstances you have the right to refuse to disclose personal data to your parents? Do you have any measures to prevent your privacy from being invaded by your parents?

Q8. Do your parents provide guidance on privacy protection?

In School

Q9. What type of personal data do you not want your teachers/school to know?

- e.g. a. Share picture without prior consent
- b. Post personal data (e.g. photos and videos) online
- c. Track your location
- d. Check text messages on your mobile phone
- e. Search lockers and drawers
- f. Discussions on Facebook as teacher was added

Q10. Do you find your teachers/school respect your privacy?

- If yes, in what ways?
- If no, what experiences relating to invasion of privacy by teachers/school do you have?
- How often do you feel that your teachers/school invade your privacy? If yes, in what ways?
- What was your response at the time?

Q11. In school, do you have any concerns about privacy? Do you have concerns about being videotaped by CCTV in school? What are the factors affecting your concerns? (e.g. covert cameras, location of CCTV cameras, number of CCTV cameras, clarity of images, retention, security).

Q12. Do you think your school should consult you before installing CCTV systems in school/classrooms?

Q13. Do you have any concerns about the collection of fingerprints? Which collection purposes would you consider justifiable? [only ask secondary school students]

Q14. Do you think your school should consult you before collecting biometric data such as fingerprints? [only ask secondary school students]

Q15. Do you have any concerns about personal data being leaked by your school?

Q16. Are there any circumstances that you have the right to not allow your school to disclose your personal data to your parents or third parties?

Q17. Do your teachers/school provide any support regarding privacy protection? (e.g. via the curriculum, textbooks, hardware support, notices).

Q18. Do you have any measures to prevent your privacy from being invaded by your school/teachers?

Social Networks/Friends

Q19. What type of personal data do you not want your peers to know?

- e.g. a. Share picture without prior consent
- b. Post personal data (e.g. photos and videos) online
- c. Track your location
- d. Check text messages on your mobile phone

Q19a. Do you have any concerns about privacy online? (e.g. awareness of behavioural tracking by website operators to build profiles for advertising and assess children's concern about being tracked)

Q20. Do you find your peers and your parents respect your privacy?

- If yes, in what ways?
- If no, what experiences relating to invasion of privacy by your peers do you have?
- How often do your peers invade your privacy?
- What was your response at the time?

Q21. Do you have any concerns about your personal data/photos/videos being posted by peers on social networks without gaining your permission first? How much do you mind this?

Q22. Will you get your peers' consent before posting their personal data/photos/videos on social networking sites? If not, why?

Q23. How will you allow your peers to upload your personal data/photos/videos?

Q24. Will you discuss or share privacy related topics with your peers? If no, why?

Q25. Do you have any measure to protect your data privacy from being invaded by your peers and online?

Overall

Q26. Are you aware of any of the consequences of the improper use of personal data? Do you have any personal experience or third party experience?

- a. Target of cyberbullying
- b. Identity theft
- c. Unsolicited marketing calls/emails
- d. Approached online by strangers
- e. Location tracked
- f. Email account hacked
- g. Scams/fraud
- h. Financial loss

Q27. Who will you consult with when you have problems concerning privacy?

B. Focus Group Guidelines for Parents

Briefly introduce the concept of “personal data” under the Personal Data (Privacy) Ordinance (PDPO) to the parents at the beginning of the discussion.

Q1. What information do you wish to know about your children that they would consider as private?

Q2. How do you know your children’s location when you are not with them?

Q3. How do you know your children’s social networks?

Q4. Do you disclose your children’s personal data through ICT (e.g. Facebook, WhatsApp) or other channels? If yes, please provide the activities and reasons for doing this?

Suggest to add more specific scenarios, such as

- Do parents post their children’s personal data/photos on Facebook or a blog?
- Do parents register Facebook accounts for their children?
- Do parents share email accounts with their children?
- Do parents share the same computer with their children at home?
- Do parents share passwords with their children?
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Q5. How do you respect your children’s privacy?

Q6. Do you think consent should be obtained from your children before collecting and using their personal data?

Q7. What mechanisms do you prefer to obtain your children’s consent?

Q8. Do you think you have the right to violate your children’s privacy? If yes, under what circumstances?

Suggest to add more specific scenarios, such as

- Do parents install surveillance systems at home or on the computer?
- Do parents look through their children’s Facebook?
- Do parents “friend” their children on Facebook?
- Do parents open their children’s letters?
- Do parents check messages on their children’s mobile phone?
- Do parents check their children’s call records?
- Do parents request children to provide their email/Facebook account passwords?

Q9. Do you give your children the right to refuse to disclose their personal data to you?

Q10. What are the privacy risks/problems faced by your children?

Ask whether the parents found that their children are aware of the aforementioned privacy risks/problems? And ask whether parents think their children have the ability to protect their privacy?

Q11. How confident are you in supporting your children to manage privacy problems?

Q12. If any, what methods do you adopt to protect your children's privacy?

C. Focus Group Guidelines for Teachers

Briefly introduce the concept of “personal data” under the Personal Data (Privacy) Ordinance (PDPO) to the teachers at the beginning of the discussion.

Q1. What information do you or your school wish to know about your students that they would consider as private? (e.g. family financial situation, family situation, life outside school).

Q2. How do you or your school collect the information mentioned above?

Q3. How do you or your school respect your students’ privacy?

Recall any cases that may involve invasion of privacy (e.g. lockers/drawers being searched, messages checked on mobile phones, academic results disclosed in class, public announcements).

Q4. Do you or your school disclose your students’ personal data through ICT (e.g. websites, Facebook) or other channels? If yes, please provide the activities and your reasons for doing this?

Q5. CCTV

- Has the school installed CCTV systems? If yes, why and did you obtain the students’ consent? Will you put notices on the CCTV?
- Do you think it invades privacy?
- How does it affect the children?
-

Q6. Biometric data (e.g. Fingerprints)

- Does the school collect biometric data from students? If yes, why?
- Do you think that it invades privacy? Why?
- How does it affect the children?

Any other activities? Exam results, family backgrounds etc.?

Q7. Will you add your students on Facebook or other social networking sites? If yes, are you aware of your students’ daily lives outside of school? Will you monitor the posts of your student’s on those sites?

- Do teachers read students’ status, posts and messages on Facebook?
- Any follow up? Counselling?
- Do you use Facebook for school work? (e.g. school activities, enrolment, post school messages/notices to students, post photos).

Q8. Do you think consent should be obtained from your students before collecting and using their personal data? Why?

Q9. Do you think you or your school have the right to violate your students' privacy? Why?

Q10. Do you give your children the right to refuse to disclose their personal data to you or your school? Why? Under what circumstances?

Q11. What are the privacy risks/problems faced by your students? (e.g. being a target of cyberbullying, identity theft, approached online by strangers).

Q12. Do you find students are aware of privacy problems? Do you think your students have the ability to protect their privacy?

Q13. What support do you or your school provide to students on privacy protection? Do you feel confident in supporting your students to manage privacy problems?

Q14. Is there a privacy policy established at your school? Is there any training/education provided by the school to teachers and students concerning privacy?

Q15. If any, what methods do you or your school adopt to protect your students' privacy? (e.g. physical security, IT systems).

Appendix II: Questions For Interviews With NGOs

1. How is your organisation involved in child privacy?
 - Types of children's personal data collected and its collection purposes
 - Storage of children's personal data? (e.g. locked cabinet/room)
 - Retention and destruction practices
 - Security of the data (e.g. password protected, cannot use peer-to-peer file sharing software)
 - Any policy/work procedures devised for the handling of personal data
2. How do you feel about child privacy in Hong Kong? Have you encountered any cases concerning child privacy? If yes, please give details.
 - Children's awareness of privacy and their ability to protect their privacy
 - Cases concerning child privacy (e.g. requests for access to personal data, leakage of data through the Internet/USBs/documents, monitoring children's behaviour through CCTV/Facebook). Any complaints?
3. Are children effectively educated about privacy? How?
 - Do children know how to protect their privacy?
4. What can be done to improve the current situation concerning child privacy?
 - At home by parenting
 - In school via the Curriculum
 - Online
 - From the Education Bureau (EBD)
 - From the Office of the Privacy Commissioner For Personal Data (PCPD)
5. Do you have any suggestions concerning the government's policies concerning child privacy?
 - a. New policy
 - b. Improvement of current policy
6. What do you think about the child privacy problems Hong Kong will face in the future? What will your organisation do?
7. Does your organisation give advice/provide consultation service to schools/teachers and parents? To what extent? And how?
Does the organisation provide training to staff concerning data privacy?