Learner Annotation Privacy & Sync Checklist

Ship notes, bookmarks, and shared annotation learners trust and you can defend. The companion article explains every line.

A. Model the record - keep notes portable, not locked in

- [ ] Store the position with W3C Media Fragments syntax: #t=252.5 (point) or #t=252,280 (span)
- [ ] Wrap the note with the Web Annotation Data Model: separate body (text) from target (the slice)
- [ ] Use a FragmentSelector with conformsTo set to the Media Fragments spec
- [ ] Decide point vs span up front - a points-only model cannot highlight a whole worked example

B. Sync - a note that does not follow the learner is broken

- [ ] Keep a local copy so learners can write offline; sync to a server keyed to their account
- [ ] Private notes: 'last write wins' on edit time is usually enough
- [ ] Shared annotation: use the Web Annotation Protocol so notes interoperate and survive migration
- [ ] For live cohorts, add a push channel (WebSocket) so new comments appear within a second or two

C. Track the signal, not the words

- [ ] Emit xAPI on the ACT of noting: ADL 'commented' verb; bookmark = Video Profile 'interacted'
- [ ] Note-taking frequency is a real active-learning signal worth measuring
- [ ] Do NOT harvest private note text into the LRS - that is surveillance, not analytics
- [ ] Store the words only where the learner expects them: their notes, or a consented shared space

D. Privacy - learner notes are personal data (not legal advice)

- [ ] GDPR: purpose & storage limitation (Art. 5); access, export, erase on request (Arts. 15-17)
- [ ] FERPA: institution-held notes can be 'education records' - support access and amendment
- [ ] Default PRIVATE; make sharing explicit, revocable, and clearly attributed before posting
- [ ] Set a retention policy, encrypt at rest and in transit, and keep shared annotation moderatable

Companion to: 'Notes, Bookmarks, and Learner Annotation'
www.forasoft.com/learn/elearning-video/articles-elearning/notes-bookmarks-learner-annotation



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This checklist covers the annotation record, sync, xAPI signals and the privacy rules for learner notes. Our seven-volume handbook covers the video stack those notes attach to; start with Volume 3 for players, chapters and real-time delivery, then Volume 7 for compliance, and Volume 1 for the video itself.

WHAT YOU WILL FIND INSIDE

- Players, chapters and seeking to a timestamp (Vol. 3)
- Compliance: EU AI Act, biometrics, C2PA (Vol. 7)
- WebRTC and real-time channels for live cohorts (Vol. 3)

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