**ONE INTERNATIONAL SCHOOL DATA PROTECTION POLICY**

ONE International School collects and uses personal information about staff, students, parents or carers and other individuals who come into contact with the school. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the school complies with its statutory obligations.

**PURPOSE**

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Philippines Data Protection Act 2012, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

What is Personal Information?

Personal information or data is defined as data that relates to a living individual who can be identified from that data, or other information held.

**DATA PROTECTION PRINCIPLES**

The Philippines Data Protection Act 2012 establishes seven enforceable principles that must be adhered to at all times:

1. Personal data shall be collected for specified and legitimate purposes determined and declared before, or as soon as reasonably practicable after collection, and later processed in a way compatible with such declared, specified and legitimate purposes only;
2. Personal data shall processed fairly and lawfully;
3. Personal data shall be accurate, relevant and, where necessary for purposes for which it is to be used, kept up to date; inaccurate or incomplete data must be rectified, supplemented, destroyed or further processing restricted;
4. Personal data shall be adequate and not excessive in relation to the purposes for which it is collected and processed;
5. Personal data processed for any purpose shall be retained only for as long as necessary for the fulfillment of the purposes for which the data was obtained or for the establishment, exercise or defense of legal claims, or for legitimate business purposes, or as provided by law; and
6. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data was collected and processed
7. Personal data shall be processed in accordance with the lawful processing of personal information under the Philippines Data Protection Act 2012;
8. Personal data shall be kept secure i.e. protected by an appropriate degree of security;

**GENERAL STATEMENT**

The school is committed to maintaining the above principles at all times. Therefore the school will:

* Inform individuals why the information is being collected when it is collected
* Inform individuals when their information is shared, and why and with whom it was shared
* Check the quality and the accuracy of the information it holds
* Ensure that information is not retained for longer than is necessary
* Ensure that when obsolete information is destroyed that it is done so appropriately and securely
* Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
* Share information with others only when it is legally appropriate to do so (see Authorised Disclosures)
* Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
* Ensure our staff are aware of and understand our policies and procedures

**AUTHORISED DISCLOSURES**

ONE International will, in general, only disclose data about individuals with their consent. However there are circumstances under which the school may need to disclose data without explicit consent for that occasion.

These circumstances are strictly limited to:

* Pupil data disclosed to authorised recipients related to education and administration necessary for the school to perform its statutory duties and obligations.
* Pupil data disclosed to authorised recipients in respect of their child’s health, safety and welfare.
* Pupil data disclosed to parents in respect of their child’s progress, achievements, attendance, attitude or general demeanour within or in the vicinity of ONE International.
* Staff data disclosed to relevant authorities e.g. in respect of payroll and administrative matters.
* Only authorised staff will be allowed to make external disclosures of personal data. Data used within the school by the staff will only be made available where the person requesting the information is a professional legitimately working with the school, who needs to know the information in order to do their work. ONE International will not disclose anything on pupils’ records which would be likely to cause serious harm to their physical or mental health or that of anyone else – including anything that suggests they are, or have been, either the subject of or at risk of child abuse. A “legal disclosure” is the release of personal information to someone who requires the information to do his or her job within or for ONE International. An “illegal disclosure” is the release of information to someone who does not need it, or has no right to it, or one which falls outside the school’s registered purposes.

All staff, parents and other users have a right under the 2012 Act to access certain personal data being kept about them or their child either on computer or in certain files. Any person who wishes to exercise this right should make a request in writing and submit it to the Head Teacher. The school will ask to see evidence of your identity, such as your passport or driving license, before disclosure of information.

The school may make a charge on each occasion that access is requested in order to meet the costs of providing the details of the information held.

The school aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days.

**SECURITY**

Appropriate building security measures are in place, such as locks on the filing cabinets/cupboards, with only authorised staff having access. Disks, USB’s and printouts are locked away securely when not in use. All classroom computers are password protected.

**COMPLAINTS**

Complaints will be dealt with in accordance with the school’s complaints policy

This policy will be reviewed as is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by the Head Teacher, or nominated representative.