



DATA PRIVACY STATEMENT

The Beacon School respects your right to privacy and is committed to the protection of your personal information in compliance and in accordance with the requirements of all relevant privacy and data protection laws, particularly the Data Privacy Act of 2012. The Confidentiality of Student and Parent Data Policy guides how all employees at Beacon School protect the privacy of student and parent data.

Please read through the Data Privacy Statement and fill in this *form* to confirm that you have read through and understand how Beacon School collects, stores, and uses the personal data that we collect.

This Data Privacy Statement explains our regulations regarding the personal data that we collect, use, or otherwise process of our applicants, students, and parents/guardians. Please note that while we give examples here to help explain this Statement, the data we collect is not limited to the examples given.

Information We Collect, Acquire, or Use

We collect, acquire, or use personal data in a number of ways. These may consist of written records, photographic and video images, and digital material. Examples include but are not limited to:

<u>Information provided during the application process.</u> When applicants & parents apply for admission, Beacon School collects, among others:

- directory information, like name, email, telephone/ mobile number, mailing address, and other contact details;
- data about personal circumstances, such as birth certificates, passport information, previous schools attended, academic performance, behavioral records, medical records, family background, history, and other relevant information:
- any or all information obtained through interviews and/or admissions tests;
- financial documentation to indicate demonstrated need in the application for scholarships; and
- relevant and professional assessments of learning and/or socio-emotional conditions that may have a significant impact on the applicant's success as a student of Beacon School.

Information we collect or generate after enrollment and during the course of their stay at Beacon School.

After applicants join Beacon School, we collect additional information, including but not limited to:

- student's academic or curricular records, such as attendance records, assessment information, standardized test scores, personal learning plans, behavioral plans, Individualized Educational Plans, etc.;
- participation in service learning and education outside the classroom opportunities;
- co-curricular activities participated in, such as after-school activities, competitions, and programs;
- any disciplinary incident that students may be involved in, including accompanying sanctions;
- school-based diagnostic assessments, observational notes of student learning and behavior;
- relevant and professional assessments of learning and/or socio-emotional conditions that may have a significant impact on the student's continued success as a member of Beacon School.

There will also be times when Beacon School will acquire other forms of data like pictures or videos of activities our community participates in, via official documentation of events and educational trips taken by the teachers, IT personnel, or hired school photographers, or through recordings from closed-circuit security television cameras installed within school premises.





How We Use Your Information

To the extent permitted or required by law, Beacon School uses personal data to pursue legitimate interests as an educational institution, including a variety of academic, administrative, research, historical, developmental, and statistical purposes. For example, Beacon School may use the information collected for purposes such as but not limited to:

- evaluating applications for admission and scholarship awards to Beacon School;
- processing confirmation of incoming students in preparation for enrollment;
- recording, generating, and maintaining student records of academic, and co-curricular progress;
- recording, storing, and evaluating student work, such as homework, seatwork, quizzes research papers, essays, culminating or integrating projects, reflection papers, math and science investigations, lab reports, essays, and presentation
- recording, generating, and maintaining records, whether manually, electronically, or by other means, of grades, academic history, class schedules, class attendance, and participation in curricular, co-curricular activities;
- sharing of assessments and grades between and among faculty members, and others with an official need, for academic deliberations, planning, and evaluation of student performance;
- archiving and analyzing student work for the purpose of reflection and peer feedback to inform unit and lesson planning;
- processing scholarship applications;
- investigating incidents that relate to student learning and behavior and implementing appropriate interventions and support initiatives;
- maintaining directories and alumni records;
- compiling and generating reports for statistical and research purposes;
- providing services such as campus mobility, counseling, health, information technology, insurance, library, parking, safety, and security, sports/recreation, and transportation;
- managing and controlling access to campus facilities and equipment;
- communicating official school announcements;
- soliciting your support, financial or otherwise, for Beacon School's programs, projects, and events;
- sharing your information with persons or institutions as provided below in the 'How We Share, Disclose, or Transfer Your Information' section.

Beacon School believes the processing of personal data for these purposes to be necessary for the performance of our contractual obligations to our community, for our compliance with a legal obligation, to protect vitally important interests, including life and health, for the performance of tasks we carry out in the public interest (e.g., public order, public safety, etc.), or for the pursuit of the legitimate interests of Beacon School or a third party. We understand that the Data Privacy Act imposes stricter rules for the processing of sensitive personal information and privileged information, and we are fully committed to abiding by those rules.

If we require your consent for any specific use of your personal data, we will collect it at the appropriate time.

How We Disclose, Share, or Transfer Your Information

As required by law, Beacon School may also disclose, share, or transfer personal data to other individuals or organizations in order to support interests and/or pursue our legitimate requirements as an educational institution. For example, Beacon School may disclose, share or transfer personal data for appropriate purposes such as but not limited to:

• preparing and presenting class lists, class schedules, and after-school activity lists, online in our community and virtual learning page, on school bulletin boards, digital displays, or other places within the campus;





- sharing of student personal data with parents, guardians, or next of kin, as required by law, or on a need-to-know basis, as determined by Beacon School, in order to promote your best interests, or to protect your health, safety, and security, or that of others;
- distributing the list of graduates and awardees in preparation for and during commencement exercises;
- sharing parent cell phone numbers, and email addresses, with room parents to enable them to assist their child/ren's homeroom teacher(s) by communicating important class activities, school events, and possible emergency announcements to the families of students in that homeroom section;
- reporting and/or disclosing information to the National Privacy Commission and other government bodies or agencies (e.g., Department of Education, Bureau of Immigration, Department of Foreign Affairs, Bureau of Internal Revenue, Professional Regulation Commission, Legal Education Board, Supreme Court, etc.), when required or allowed by law;
- submitting student work and other documentation as required by the International Baccalaureate Organization for the purposes of evaluating our Primary Years and Middle Years Programmes or other accrediting agencies;
- sharing of transcripts, letters of recommendation, and other information explicitly requested of other schools, whether local or abroad, for application purposes, released with the formal consent of parents;
- sharing of information with sports or academic entities or organizations (e.g., MISAA) for determining eligibility in sports or academic competitions, as well as other similar events;
- Sharing photos or videos related to school marketing, fundraising, and promotions that may build the school's reputation and online presence;
- reporting to the Board of Trustees applicants for admission and scholarship;
- complying with court orders, subpoenas, and/or other legal obligations;
- conducting internal research or surveys for purposes of institutional development;
- publishing academic, co-curricular, and extra-curricular achievements and success, including honors lists and names of awardees in school, on the website, newsletters, and publications; our Photo Release form, to be answered every year, gives us your choice of exposure in our school publications and website. Failure to return the form with your preferred choice by the due date means you have accepted our right to publish materials as we see fit in our school publications;
- live-streaming of Beacon School events on digital display boards and televisions within the school premises.
- The school is subscribed to online services that support teaching and learning activities such as but not limited to Google Suite for Education, Managebac, BrainPop, Padlet, Braincamp, Zoom, and other cloud-based applications to which the school may subscribe for educational purposes). Such subscription may include the sharing of names and email addresses of the students.

How We Store and Retain Your Information

Access to personal data is limited to Beacon School's personnel who have a legitimate interest in them for the purpose of carrying out their contractual duties Beacon School staff who have access to student data are aware of their responsibility to safeguard it and sign an agreement to follow school policies and guidelines related to data privacy.

Personal data is stored and transmitted securely in a variety of paper and electronic formats, including databases that are shared between Beacon School's different departments or offices, with access to information limited only to those who require it, as granted through network permission settings.

Beacon School conducts electronic security audits to ensure that our hardware, software, and IT architecture are secure.

Files created and stored through Google Suite for Educators and stored on Google servers. We do not store parent master lists or highly sensitive student records on Google servers. The main use of Google Suite is for student work, surveys, and organizing school programs and activities. These files may also be accessed by 3rd party software developers for Google add-ons and extensions; Beacon endeavors to only push in applications that meet the standards of the General Data Protection Regulation and the Data Privacy Act of 2012 (RA 10173)





Confidential information contained in Admissions, Student Learning Services, Publications, or Guidance files is paper files kept in the respective office in a locked filing cabinet and accessible to the professional working with the student for up to 10 years.

Information from these confidential files is only shared with a waiver of confidentiality signed by the student's parents, and the purpose of disclosing the information is to seek external and professional support to guide our care of the student.

Unless otherwise provided by law or by appropriate Beacon School policies, we will retain your relevant personal data indefinitely for historical and statistical purposes. Where a retention period is provided by law and/or a Beacon School policy, all affected records will be securely disposed of after such periods such as Diplomas and Transcripts of Records which will be stored in Student Services files in perpetuity as needed by general practices of the Student Services Staff and the Admissions, Advancement, Communications, and Student Services Manager.

Beacon School will consistently make sure that the use of personal data will not be excessive or unnecessary. Access to information is limited to those who require it to carry out their responsibilities.

Special Considerations

Our Student Learning Services Advisers follow best practices as prescribed by the field of practitioners who provide special support services to students within a school setting and are bound by professional ethical standards related to the confidentiality of sensitive information.

Students receiving support from Student Learning Services have records that are maintained as paper files and stored in a locked cabinet in the SLS office with access by the students' SLS Adviser and SLS Coordinator. Relevant and specific information to assist a student's teachers with appropriate strategies to support the student is shared with current teachers. Waivers of confidentiality are signed by parents to allow members of the SLS team to speak directly with consultants external to Beacon School who work with the student on specific skills / using specific interventions. The purpose of these consultations is to ensure alignment of goals, consistency of support, and the exchange of information about what strategies can best help the student succeed. Records, reports, or any Information contained in these files may not be shared with professionals, individuals, or organizations outside Beacon School without parent consent.

Our Guidance Counselors are bound to the ethical standards of the American Counseling Association and The Code of Ethics for Registered and Licensed Guidance Counselors in the Philippines

Guidance notes and records are kept as paper files in a locked cabinet in the Guidance Counselor's office. Guidance notes are privileged and may not be shared.

Information learned from a guidance session with a student may only be shared with a member of the Leadership Team who has the authority and responsibility to work toward the improvement of the situation. At that time, the member(s) of the Leadership Team are bound to the same professional guidelines of confidentiality. General information may be shared with the teacher(s) working with the student to make adjustments given the student's unique circumstances. Otherwise, the only context in which a Guidance Counselor may share confidential information, as prescribed by international standards of mental health professionals, is when there is a significant and immediate risk of harm to self, others, or property.

Waivers of confidentiality are signed by parents to allow Beacon School Guidance Counselors to speak with mental health providers external to Beacon who work with students on skills – whether social, emotional, or decision-making -- to improve well-being. The purpose of these consultations is to ensure alignment of goals, consistency of support, and to inform the professional how the student presents in the school setting, to provide guidance on the progress of the student.

Discipline records related to sanctions may be accessed by members of the Leadership Team involved in investigating incidents and the decision-making process resulting in student sanction, behavior plan, or student action.





Behavior plans developed by Guidance Counselors to support students are made in consultation with and then shared with the student's teachers.

Photos and Videos of Beacon School Students

Student photographs and videographs are taken on a regular basis to record student learning and events, activities, and performances that students participate in. These photos are published in the school yearbook, in the school newsletter, in grade level newsletters, on the Digital Information Display system, on the community and virtual learning pages of the school website that are password-protected, in the public area of the school website, and the official social media accounts of the school. Photos are archived for future use in school publications for distribution to school community members.

Photos and videos of students at work as well as their work are included and archived in curriculum records for analysis and reflection on student learning. For special occasions throughout the year, including but not limited to Commencement, Moving On Ceremony, First Communion, and Confirmation, parents hire an official photographer to record individual and group photographs.

Parent permission is needed before the school places photos of a student in media that is accessed publicly or distributed outside the immediate Beacon School community, whether Beacon produced, e.g. school website (password-protected or public) and brochures, or for placement in external media, e.g. newspapers, TV, external websites, or official social media accounts of the school. In these cases, students' enrollment, parents sign an understanding to:

- Acknowledge their understanding that photographs or videos of their child/ren and their work may be posted in password-protected sections of the website, in the newsletter, and on DIDs.
- Acknowledge their understanding that separate permission is sought from the school before placing student photos
 in brochures, advertisements, on the public pages of the school website, or on the official social media accounts of
 the school.

Teachers, staff, managers, or administrators of the school may not post on their private social media sites photos or videos that include students or their families taken at school-sponsored events as long as they have documented consent from the parents or official guardians.

Guests of the school professionally engaged by the school are discouraged from taking photos and are advised that they may not post them on their personal or professional blogs, websites, or social media sites.

Guests of the school who are allowed to observe classes for professional development or ongoing educational degree requirements may take photos of students at work and their work with the following qualification:

- Students' full names may not appear.
- Photos of students may only be taken from an angle where they cannot be identified, e.g. from behind, or from above
- The student uniform may not be identifiable as Beacon's.

Working with Third Parties

Beacon School may also acquire the services of a third-party supplier to process personal data such as but not limited to printing of yearbooks and other printing requirements needed by the school. In some instances, the school may outsource the collection of personal data of students such as an outsourced photographer or videographer for school events. In these instances, the school ensures that data privacy is protected through the appropriate data sharing agreements or data outsourcing agreements with explicit provisions on personal data protection from data collection, usage, storage, and disposal. The Beacon School shall also work to ensure that third-party suppliers and individual providers should be registered with the National Privacy Commission and compliant with the Data Privacy Act.





Your Rights with Respect to Your Personal Data

We recognize your rights with respect to your personal data. Should you have any concerns or questions regarding them, this Statement, or any matter involving Beacon School and data privacy, you may contact our Data Protection Officer (DPO) at privacy@beaconschool.ph

Changes to This Statement

We may, from time to time, make changes to this Statement. If changes are required, we will let you know through our website and other internal means of communication. Any modification is effective immediately upon announcement through our communication channels.

Basic Rights of the Data Subject

(Source: RA 10173 https://privacy.gov.ph/data-privacy-act/)

As the Data Subject, you are afforded the following rights as written in RA 10173 otherwise known as the Data Privacy Act of 2012.

- 1. The right to be informed whether personal information pertaining to him/her shall be, are being or have been processed.
- 2. The right to be furnished with the information before the entry of his/her personal information into the processing system of the personal information controller.
- 3. The right to reasonable access to the data subjects information upon demand.
- 4. The right to dispute the inaccuracy or error in the personal information and have the personal information controller correct it immediately and accordingly, unless the request is vexatious or otherwise unreasonable.
- 5. The right to suspend, withdraw, or order the blocking, removal, or destruction of his or her personal information from the personal information controller, filing system upon discovery and substantial proof that the personal information are incomplete, outdated, false, unlawfully obtained, use for unauthorized purposes or are no longer necessary for the purposes for which they were collected.
- 6. The right to be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal information.
- 7. The right to data portability thru the ability to obtain from the personal information controller a copy of the data undergoing processing in an electronic or structured format, which is commonly used and allows for further use by the data subject.
- 8. The right to lodge a complaint before the National Privacy Commission.

Please confirm your understanding of and agreement to the Beacon School Data Privacy Statement as set forth in the document above and included in the Student-Parent Handbook by filling in this <u>form</u>. A signed agreement form will be required once the new School Year starts.

References:

Confidentiality of Student and Parent Records (Beacon School Policy, 2015) National Privacy Commission Privacy Toolkit Beacon Academy and other Private School Privacy Statements