



Wellbeing@VIS 

VIS PRIVACY NOTICE & DATA PROTECTION POLICY

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The VIS Core

VIS is a diverse community of learners who are inspired to thrive in rapidly changing environments. Our learners are guided by a strong core: a clear mission, a progressive vision, meaningful values, and a research-based set of learning principles.

Our Mission

We challenge, inspire, and empower our learners to develop their unique potential in our changing world.

Our Vision

We will lead the way toward a sustainable future

Our Values

We value balance, respect, resilience, innovation and courage

The VIS Learning Principles

We learn when we build and apply new understandings and skills in a variety of contexts. The following research-based learning principles guide our teaching practice:

- **Learners At The Center:** Recognizing learners as core participants and encouraging active engagement.
- **Learners Are Unique:** Engaging all learners and adapting to individual needs.
- **Learners Have Emotions:** Understanding the role of emotion and being aware of individual motivations.
- **Learners Have Potential:** Embracing challenging expectations while understanding individual variations.
- **Learners Are Collaborative:** Recognizing the value of social interaction to engage with multiple perspectives.

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- **Learners Make Connections:** Linking understandings and transferring learning to new situations.
 - **Learners Are Reflective:** Having a clear purpose, understanding next steps, and using feedback to support growth

Our definition of learning is further underpinned by how we approach intercultural learning at VIS: by developing students' empathy and respect for different cultures, opinions and perspectives; building an understanding of themselves and others to be engaged citizens both locally and globally.

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1.0 Introduction

Vientiane International School Sole Co Ltd (VIS) is an independent private school registered in Laos – Business Registration Number 1051. We take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the Laos law and international GDPR standards.

This privacy notice provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact dataprotection@vislao.com. This “VIS Privacy Notice and Data Protection Policy” describes the framework by which VIS seeks to provide a safe environment for the storage of student, parent and employee data in accordance with the Board of Trustees’ Policy on Data Protection and Cyber Security which is as follows:

DATA PROTECTION AND CYBER SECURITY

The Head of School shall take steps to ensure that there is a robust Data Protection Framework in place which:

- complies with the school’s legal obligations under GDPR and Lao legislation relating to Data Protection
- provides a safe environment for the storage of student, parent and employee data
- mitigates the risk of a data breach or cyber-attack that may put the school at risk
- complies with the CIS accreditation standards.

This will include the establishment of a Data Protection Team which must complete an annual self-assessment of the school’s preparedness against the CIS accreditation standards as a means of monitoring progress against the benchmarks, and the results of the same should be reported to the Board annually together with a plan for the coming year in terms of areas of focus.

2.0 Types Of Personal Data We Process

We process personal data about prospective, current and past: students and their parents; employees, suppliers and contractors; donors, friends and supporters; and other individuals connected to or visiting the school (including students enrolled in our summer program).

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;
- health and wellbeing data;
- education and employment data;
- images, audio and video recordings;
- financial information;
- training courses attended.

As a school, we need to process special category personal data (e.g. concerning health, nationality, or biometric data) and criminal records information about some individuals (particularly students and employees). We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

3.0 Collecting, Handling And Sharing Personal Data

We collect most of the personal data we process directly from the individual concerned (or in the case of students, from their parents). In some cases, we

collect data from third parties (for example, referees, previous schools, or professionals working with the individual) or from publicly available resources. Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and organizational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. We do not transfer personal data outside of the School unless we are satisfied that the personal data will be afforded an equivalent level of protection.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as examination boards, the school's professional advisors and relevant authorities (e.g. Laos Immigration, Social Services and Tax Authorities, local village Headmen and/or landlords,). Some of our systems are provided by third parties, e.g. hosted databases, school website, or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not otherwise share or sell personal data to other organizations for their own purposes.

4.0 Purposes For Which We Process Personal Data

We process personal data to support the School's operations as an independent international school for students between the ages of 3 and 18+, and in particular for:

- The selection and admission of students.
- The provision of education to students including the administration of the school curriculum and timetable; monitoring student progress and educational needs; reporting on the same internally and to parents;

administration of students' entries to public examinations, reporting upon and publishing the results; providing references for students (including after a student has left).

- The provision of educational support and related services to students (and parents) including the maintenance of discipline; provision of careers and library services; administration of sports fixtures and teams, school trips; provision of the school's IT and communications system and virtual learning environment (and monitoring the same) all in accordance with our IT policies.
- The provision of educational courses during school holidays to students enrolled on such courses.
- The safeguarding of students' welfare and provision of counseling, welfare, health care services.
- The research into and development of effective teaching and learning methods and best practice;
- Compliance with legislation and regulation including the preparation of information for accreditation by the Council for International Schools (CIS) and Western Association of Schools and Schools (WASC), the US State Department Offices for Overseas Schools in support of annual applications for grant funding, and the International Baccalaureate Organization as an accredited IB World School.
- Operational management including the compilation of student records; the administration of invoices, fees and accounts; the management of the School's property; the management of security and safety arrangements (including the use of CCTV in accordance with our CCTV Policies and monitoring of the school's IT and communications systems in accordance with our Acceptable Use Policy); management planning and forecasting; research and statistical analysis; the administration

and implementation of the School's rules and policies for students and Employees; the maintenance of historic archives and other operational purposes.

- Employee administration including the recruitment of Employees/ engagement of contractors (including compliance with DBS procedures); administration of payroll, pensions and sick leave; review and appraisal of Employees performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former Employees; and providing references.
- The promotion of the School through its own websites, the prospectus and other publications and communications (including through our social media channels).
- Maintaining relationships with alumni and the wider school community by communicating with the body of current and former students and/or their parents or guardians and organizing events.

The processing set out above is carried out to fulfill our legal obligations (including those under our parent contract and employees' employment contracts). We also expect these purposes to form our legitimate interests.

5.0 Keeping In Touch

We keep in touch with alumni, current or former parents or other members of the school community. We will use your contact details to keep you updated about our activities and invite you to events of interest by email. We ask you to let us know your data preferences so that we can ensure our communications are relevant to you. You can update your data preferences at any time by contacting dataprotection@vislao.com

6.0 How Long We Keep Personal Data

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. In Laos we are required to keep all financial records for a minimum of ten years. We have adopted Records Retention Guidelines which set out the time period for which different categories of data are kept. If you have any specific queries about our record retention periods or wish to request that your personal data is considered for erasure, please contact dataprotection@vislao.com.

7.0 Your Rights

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always have the right to withdraw consent, where given, or otherwise object to receiving generic communications. Please be aware, however, that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice or may exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because of a purchase of goods or services).

If you would like to access or amend your personal data, or would like it to be transferred to another person or organization, or have some other objection to how your personal data is used, please make your request in writing to dataprotection@vislao.com.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month

in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any student examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by or to the school for the purposes of the education, training or employment of any individual.

8.0 Student Data

The rights under Data Protection legislation both in Laos PDR and GDPR belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to students (if consent is required) unless, given the nature of the processing in question, and the student's age and understanding, it is more appropriate to rely on the student's consent. Once students reach the age of 16, their data belongs to them, and parental consent will no longer apply.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, we will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student's activities, progress and

behavior, and in the interests of the student's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the student or other students, or is required by law.

Students can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. Students in Grades 9 to 12 are generally considered to have sufficient maturity to make an informed request. A person with parental responsibility will generally be entitled to make a subject access request on behalf of students, but the information in question is always considered to be the child's at law. A student of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.

9.0 Change Of Details

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify the School Registrar (registrar@vislao.com) of any significant changes to important information, such as contact details, held about you.

10.0 This Policy

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our

Parent Contract, our Safeguarding Policy, Health & Safety Policies, Acceptable Use Policies and IT Policies.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify dataprotection@vislao.com in the first instance.