



# UNIVERSITY OF SANTO TOMAS

OFFICE OF THE SECRETARY-GENERAL

## PROCESS, PATHWAYS, AND REQUIREMENTS

for the approval of a request for personal data needed for the online deployment of data-gathering tools for a thesis, dissertation, or commissioned research:

### Legend:

**AU** – Academic Unit

**COP** – Compliance Officer for Privacy

**DPO** – Data Privacy Officer

**ERC** – Ethics Review Committee

**MOA** – Memorandum of Agreement

**NDA** – Non-disclosure Agreement

**OVRRI** – Office of the Vice-Rector  
for Research and Innovation

**UST** – University of Santo Tomas

### A. PATHWAYS OF APPROVAL FOR THE REQUESTS FROM INTERNAL PROPONENTS

Process	STEP 1 Apply for UST ERC Clearance	STEP 2 Determine the source of the personal data	STEP 3 Apply for review and approval from the OVRRI	STEP 4 Apply for review and clearance from COP <sup>1</sup>	STEP 5 Apply for DPO
	Is UST Ethics Review Committee (ERC) clearance required?	What is the source of the personal data?	Does it need a review and approval from the OVRRI?	Does it need a review and clearance from the COP?	Does it have an approval from the DPO?
Pathways of Approval	YES, even if clearance from external ERC is presented.	Academic Unit Level data	Not Applicable	YES	YES
		University Level data	YES	YES	YES
Requirements	Submit the following: a) Approved research proposal; b) Consent form; and c) Research instruments	Requirements for Academic Unit Level data	Not Applicable	Submit the clearance from ERC.	Submit ERC clearance of UST and AU approval.
		Requirements for University Level data	Submit a proposed MOA <sup>2</sup>	Submit the clearance from OVRRI.	Submit the approval from OVRRI and COP.

<sup>1</sup> The Compliance Officer for Privacy (COP) for Academic Unit level data is the head of the Academic Unit while the COP for University level data is the head of the concerned University unit.

<sup>2</sup> The Memorandum of Agreement (MOA) must stipulate the responsibility of the researchers in terms of the different phases of the data life cycle.



UNIVERSITY OF SANTO TOMAS  
OFFICE OF THE SECRETARY-GENERAL

**B. PATHWAYS OF APPROVAL FOR THE REQUESTS  
FROM EXTERNAL PROPONENTS**

	<b>STEP 1</b> Apply for UST ERC Clearance	<b>STEP 2</b> Apply for review and approval from the OVRRI	<b>STEP 3</b> Apply for review and clearance from COP	<b>STEP 4</b> Apply for DPO approval
<b>Process</b>	Is UST Ethics Review Committee (ERC) clearance required?	Does it need a review and approval from the OVRRI?	Does it need a review and Clearance from the COP?	Does it have an approval from the Data Privacy Officer (DPO)?
<b>Pathway of Approval</b>	YES <sup>3</sup> , even if clearance from external ERC is presented.	YES	YES	YES
<b>Requirements</b>	Submit the following: a) Approved research proposal; b) Consent form; and c) Research instruments	Submit UST ERC's certificate of clearance.	<i>Third-party data sharing</i>	Submit the approval from OVRRI and COP.
			A. <i>If the data <u>will be shared</u> to a third party, submit NDA.<sup>4</sup></i>	
			B. <i>If the data <u>will NOT be shared</u> to a third party, submit MOA.<sup>5</sup></i>	

<sup>3</sup> Whether the study requires sharing of personal data to an external party or not, the approval to the next step depends on the favorable review of the Ethics Review Committee.

<sup>4</sup> The Non-disclosure Agreement (NDA) must stipulate the extent of responsibility of the researchers and collaborators in terms of the data life cycle, particularly on disclosure/data sharing.

<sup>5</sup> The Memorandum of Agreement (MOA) must stipulate the responsibility of the researchers in terms of the different phases of the data life cycle.



UNIVERSITY OF SANTO TOMAS  
OFFICE OF THE SECRETARY-GENERAL

**C. GUIDE QUESTIONS TO BE CONSIDERED IN THE PREPARATION OF THE  
MEMORANDUM OF AGREEMENT AND NON-DISCLOSURE AGREEMENT**

COLLECTION	What is the purpose of requesting the personal information or sensitive personal information? How will the consent be obtained?
STORAGE	How and where will the requested data be stored? Will the storage of data be outsourced?
USAGE	How will the data be used or what is the purpose of its processing?
RETENTION	How long will the data be retained and why? Will the data retention process be done by the researchers or by an outsourced party?
DISCLOSURE/ SHARING	To whom will the data be disclosed to? Why is it being disclosed?
DISPOSAL/ DESTRUCTION	How will the data be disposed? Who will facilitate the destruction of the data?