



المدرسة المنذية العامة العليا الخاصة Indian Public High School Private

POLICY NAME:	DATA PROTECTION POLICY				
APPROVAL AUTHORITY:	PRINCIPAL	ADOPTED:	03.05.2021	REVIEWED:	03.10.2022
RESPONSIBLE EXECUTIVE:	E-SAFETY OFFICER	REVISED:	15.4.2025	NEXT REVIEW ON:	15.4.2026
RESPONSIBLE OFFICE:	IT DEPARTMENT	AVAILABLE:	IN THE LIBRARY, WEBSITE, NLP		

Introduction

This policy has been formulated in consultation with the staff, parents and School Management in order to comply with the UAE General Data Protection Regulation (GDPR)

The school's Data Protection Policy applies to the *personal data* held by the school's Management, which is protected by the Data Protection Acts Article 31 of the UAE Constitution is considered to represent a general right to privacy for citizens of the UAE: it provides for the right to freedom and secrecy of communication by post, telegraph or other means of communication under law.

The policy applies to all school staff, School Management, parents/guardians, students and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the school) insofar as the measures under the policy relate to them. Data will be stored securely so that confidential information is protected in compliance with relevant legislation. This policy sets out the manner in which personal data and special categories of personal data will be protected by the school.

Scope

The Data Protection legislation applies to the keeping and processing of *Personal Data*. The purpose of this policy is to assist the school to meet its statutory obligations, to explain those obligations to School staff, and to inform staff, students and their parents/guardians how their data will be treated

The policy applies to all school staff, Management, parents/guardians, students and others (including prospective or potential students and their parents/guardians, and applicants for staff positions within the school) insofar as the school handles or processes their *Personal Data* in the course of their dealings with the school.

Definition

In order to properly understand the school's obligations, there are some key terms, which should be understood by all relevant school staff:

Personal Data means any data relating to an identified or identifiable natural person i.e. a living

individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the Record keeper

Data / Record kept are:

- Obtaining, recording or keeping the data;
- Collecting, organising, storing, altering or adapting the data;
- Retrieving, consulting or using the data;
- Disclosing the data by transmitting, disseminating or otherwise making it available;
- Aligning, combining, blocking, erasing or destroying the data;

Data Protection Principles

The school Management (record keeper) is a *data controller of personal data* relating to its past, present and future staff, students, parents/guardians and other members of the school community.

1. Obtain and Process Personal Data fairly

Information on students is gathered with the help of parents/guardians and staff. Information is also transferred from their previous school, if applicable. In relation to information the school holds on other individuals (members of staff, individuals applying for positions within the School, parents/guardians of students, etc.), the information is generally furnished by the individuals themselves with full and informed consent and compiled during the course of their employment or contact with the School. All such data is treated in accordance with the Data Protection Law and the terms of this Data Protection Policy. The information will be obtained and processed fairly

2. Consent

Where consent is the basis for provision of personal data, (e.g. data required to join sports teams/ after-school activity or any other optional school activity) the consent must be a freely-given, specific, informed and unambiguous indication of the data subject's wishes.

3. The School Management will inform individuals of the reasons they collect their data and the uses to which their data will be put. All information is kept with the best interest of the individual in mind at all times.

4. Process it only in ways compatible with the purposes for which it was given initially

Data relating to individuals will only be processed in a manner consistent with the purposes for which it was gathered. Information will only be disclosed on a 'need to know' basis, and access to it will be strictly controlled

5. Keep Personal Data safe and secure

Only those with a genuine reason for doing so may gain access to the information. Personal Data is securely stored under lock and key in the case of manual records and protected with computer software and password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops/PC) are encrypted and password-protected.

6. Keep Personal Data accurate, complete and up-to-date

Students, parents/guardians, and/or staff should inform the school of any change which the school should make to their personal data and/or sensitive personal data to ensure that the individual's data is accurate, complete and up-to-date. Once informed, the school will make all necessary changes to the relevant records. Records must not be altered or destroyed without proper authorization. If alteration/correction is required, then a note of the fact of such authorization and the alteration(s) to be made to any original record/documentation should be dated and signed by the person making that change.

9. Provide a copy of their personal data to any individual on request

Individuals have a right to know and have access to a copy of personal data held about them, by whom, and the purpose(s) for which it is held

Personal Data

The *Personal Data* records held by the school **may** include:

1. **Staff records:**

As well as existing members of staff (and former members of staff), these records may also relate to applicants applying for positions within the school, trainee teachers and teachers being probated. These staff records may include:

- Name, address and contact details, SIS number.
- Name and contact details of next-of-kin in case of emergency.
- Passport Copy, Emirates Id Copy and visa copy etc
- Original records of application and appointment to promotion posts
- Details of approved absences (career breaks, parental leave, study leave, etc.)
- Details of work record (qualifications, classes taught, subjects, experience certificate etc.)

2. **Student records:**

These may include:

- Information which may be sought and recorded at enrolment and may be collated and compiled during the course of the student's time in the school. These records may include:
 - name, address and contact details, SIS number;
 - date and place of birth;
 - names and addresses of parents/guardians and their contact details
 - religious belief;
 - Passport Copy, Emirates Id Copy and visa copy etc
 - any relevant special conditions (e.g. special educational needs, health issues,) which may apply;

- Information on previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student;
- Psychological, psychiatric and/or medical assessments;
- Attendance records;
- Academic record – subjects studied, class assignments, examination results as recorded on official school reports;
- Records of significant achievements;
- Whether the student is exempt from studying any language;
- Records of disciplinary issues/investigations and/or sanctions imposed;
- Health Record;
- Other records e.g. records of any serious injuries / accidents, (Note: it is advisable to inform parents that a particular incident is being recorded).

CCTV images/recordings-

- CCTV is installed in IPHS.
- These CCTV systems may record images of staff, students and members of the public who visit the premises.
- The viewing station is in the main School Administration office and Principal's Office.
- **Purposes:** Safety and security of staff, students and visitors and to safeguard school property and equipment.
- **Security:** Access to images/recordings is restricted to the Principal and School Management. Recordings are retained for 90 days, except if required for the investigation of an incident.

Examination results

- The school will hold data comprising examination results in respect of its students. These include class, term 1 and term 2, annual and continuous assessment results, Diagnostic Test results and the results of Standardized Tests
- The main purpose for which these examination results are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardians about educational attainment levels and recommendations for the future. The data may also be aggregated for statistical/reporting purposes, such as to compile results tables. The data may be transferred to the MOE and other schools to which a pupil will move to.