



ABU DHABI

Information & Data Protection Policy

B – School Administration Policies & Procedures

Key author	Bursar
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Data Protection Policy

(1) Context

The British School Al Khubairat collects and uses personal information about students, parents, employees, Governors, alumni and other individuals who come into contact with the School. This information is gathered in order to enable the School to provide education and other ancillary functions. In addition there may be legal requirements from time to time to collect and use information to ensure that the School complies with its statutory obligations.

This Policy is designed to ensure the School operates the highest standards of data governance by which personal information is dealt with correctly, securely and in line with best practice.

The Policy will apply to all personal 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.

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

All employees involved in the collection, processing and disclosure of personal data must be aware of their duties and responsibilities by reading, understanding and adhering to this Policy.

(2) UAE Law

The UAE has no federal laws covering information and data protection, but instead has a broad provision within its constitution for a general right to privacy for its citizens.

(3) Core principles

The School will adhere to the following core principles in the collection, storage, use, sharing and destruction of personal data:

- (i) Personal data shall be processed fairly and lawfully.
- (ii) Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
- (iii) Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.
- (iv) Personal data shall be accurate and, where necessary, kept up to date.
- (v) Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or purposes.

- (vi) Personal data shall be processed in accordance with the rights of data subjects.
- (vii) Appropriate disciplinary action shall be taken against unauthorized or unlawful processing of personal data by employees and against accidental loss or destruction of, or damage to, personal data.

(4) Linked policies

The BSAK Data Protection Policy cannot sit in isolation and its successful implementation is anchored on employees understanding and complying with the following key linked policies:

Record Keeping Policy

Taking, Storing and Using Images of Children Policy

Acceptable Use Policy (Employees)

Educational Trips and Visits Policy

(5) General statement

The School is committed to maintaining strong data governance at all times. Therefore, the School will:

- Inform individuals why personal information is being collected at the point of collection in terms which are clear and straightforward.
- 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 unauthorized disclosure, irrespective of the format in which it is recorded.
- Share information with others only when it is legally appropriate to do so.
- Set out procedures for responding to requests for access to personal information.
- Ensure all employees are aware of and understand the BSAK Data Protection Policy.

(6) Data Protection Officer

The School appoints the Bursar as the Data Protection Officer and as such the Bursar will monitor observance of the principles above and will report annually to the Board of Governors.

(7) Privacy Notices

The School will develop and implement all appropriate Privacy Notices (for students, parents, employees, Governors and alumni) to inform individuals as to why personal data will be collected, how personal data will be processed, how long personal data will be stored and with whom personal data will be shared.

(8) Complaints

Any complaints relating to Data Protection will be dealt with in accordance with the School's Complaints Policy.

(9) Responsibilities

The Board of Governors delegates and provides resources to the Headmaster and the Bursar who are responsible for the implementation of this Policy through the associated Procedures.