



ABU DHABI

Data Protection Procedures

B – School Administration Policies & Procedures

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Data Protection Procedures

(1) Context

These Procedures are fully compliant with the Data Protection Policy.

The British School Al Khubairat will comply with the principles outlined in its Data Protection Policy to ensure that personal information is dealt with correctly and securely in relation to the collection, storage, use, sharing and destruction of personal data.

The Policy applies to data controllers (ie the School) and to data processors (ie employees). A controller determines the purposes and means of processing personal data; the processor is responsible for processing personal data on behalf of the controller.

The Policy applies to the processing of personal data, meaning any personal information relating to an individual who can be directly or indirectly identified from this data.

The School will implement best practice for data governance by documenting the purposes for the processing of personal data through **privacy notices** which inform individuals about how and why their personal information is being processed. The School will also consider when and if the purpose of processing personal data changes; for example, a student becoming an alumni; and the communication with individuals and corresponding privacy notices will reflect this.

(2) Roles and responsibilities

Responsibility for information governance rests with the most senior level of accountability, specifically the Board of Governors.

The Board appoints the Bursar as the Data Protection Officer (DPO) and as such the Bursar will oversee data protection compliance and will report annually to the Board.

Data processors are BSAK employees who are responsible for processing personal data as per the table overpage:

Data	Data Handler(s)
Student joining, progress and departure data	Registrar and Admissions team
Marketing and communications	Head of Communications, Admin Assistants
Medical data	Head of Nursing, Admin Assistants, Nurses
Alumni and development	Head of Communications
Education	SLT, HoYs, HoDs, Admin Assistants, all users of iSAMS, Exams Officer
Pastoral information	SLT, HoYs, HoDs, Admin Assistants, all users of iSAMS, Counsellor
Disciplinary information (students)	SLT, HoYs, HoDs, Admin Assistants, all users of iSAMS
Incidents and accidents	All users of Evolve
Safeguarding	Designated Safeguarding Leads
Employee personal data (including payroll, contract, disciplinary etc)	HR Manager, HR team, PRO Manager, PRO team, Finance Manager, Finance team

(3) Data streams and data handling

BSAK deals with five main data streams as follows:

- Students;
- Parents;
- Governors;
- Employees / volunteers;
- Alumni / past parents.

Each data stream has its own sensitivities, lawful bases for processing, and methods of processing, including the retention period or how data is destroyed.

Students

In dealing with students, the School has to consider two broad data streams. The first is generated by the student joining, progressing through, and departing from, the School. The second set of data is generated by the interaction between the student and the School, and this will cover education, pastoral information, disciplinary information, incidents or accidents, etc.

Most of this information will be relatively straightforward to process; however, there will be instances where there is a third category of data, which is sensitive data concerning health, medical conditions, family circumstances or safeguarding issues.

All of this student data can be processed by BSAK using the lawful basis of the Parent Contract, as there is thereby a contractual/legal obligation in place between the parents and the School to process the data of the student.

Parents

It may sometimes be necessary for the School to get separate consents for particular activities that the student undertakes. These will not simply be data protection consents, but may be parental consents to certain activities. However, there is likely to be a personal data element which needs to be captured through policy and procedure as follows:

Activity	School Policy
Photographing of students for use in School marketing material or social media	<i>Taking, Storing and Using Images of Children Policy</i>
School trips and events, including sporting activities	<i>Educational Trips and Visits Policy</i>
Use of School buses	<i>Bus Service Policy and Procedures</i>

Governors

The processes of governance require records. Best practice is that Governors should carry out official school business on secure school systems including school email accounts.

BSAK is working with Convene to ensure the safety and confidentiality of sensitive School information.

Employees / volunteers

Records are required to be kept of applications, the interview, the reference and clearance process including police and DBS checks, before an employee starts at BSAK. This information is collated by the HR Department through the Single Central Register (SCR). Volunteers and embedded contractors are also included in this process.

Once employed, an employee's career path into, through and on departure from the School will be recorded including annual appraisals, changes in contractual terms, and if applicable disciplinary procedures and outcomes.

Alumni / past parents

BSAK processes the personal data of alumni and past parents through the Graduway portal. This processing includes storing personal data, sending newsletters and invitations to events, processing donations, and using information in the public domain to research and contact alumni.

Within alumni relations, much of this processing of personal data is for direct marketing purposes. Where this communication is designed to promote the aims and objectives of the School, BSAK will clarify the basis for processing this personal data and as appropriate will seek consent.

(4) Consent

The School considers that consent must be a freely given, specific, informed and unambiguous indication of the individual's wishes. The School sets a high standard for consent, which means offering individuals a genuine choice and not relying on either pre-ticked boxes or opt-outs.

In addition, the School will also maintain records of consent which have been received. This consent will not be wrapped up in general terms and conditions, and will be clear and explicit. For example, a student cannot give consent to be contacted as an alumni when leaving BSAK simply through the Parent Contract signed on joining the School.

(5) Privacy notices

The School will publish privacy notices to inform individuals about who we are, why and how we will process personal data, and with whom this data will be shared.

The information provided to data subjects through privacy notices will be:

- Concise, transparent, intelligible and easily accessible;
- Written in clear and plain language;
- Free of charge.

In order to meet the requirements of the BSAK Data Protection Policy in the collection, storage, use, sharing and destruction of personal data, BSAK has developed a number of privacy notices as attached in **Schedule A** below.

(6) Record keeping

These Data Protection Procedures need to be read, understood and implemented in conjunction with the BSAK Record Keeping Policy.

APPENDIX A – PRIVACY NOTICES

Template 1: Parents (or guardians) of children at the School or applying to join the School

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the School, and the School will therefore have a legitimate interest for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to form and maintain the parent contract between you and the School.

We see the provision of personal data as necessary to properly admit your child into the School and to administer and fulfill our obligations under the contract once your child is a student here.

The School will share your data with the following organisations who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, as follows:

- UAE government departments and regulatory authorities including ADEK, the Ministry of Education and the Ministry of Interior CPC;
- Catering contractor
- Photographer
- Bus company
- Healthcare service provider
- IT software provider
- Insurance provider

It is not necessary for data to be shared with other countries. The exceptions to this are:

- Reference requests required to transfer to an alternative school.
- International school trips that the School organises, in respect of which you will be contacted separately for consent which will be limited in time and content.

The retention period for student data will be until the student reaches the age of 25.

You have the right to withdraw your consent to data processing at any time.

We will obtain the data the School requires directly from you; should we need any additional data from other sources, we will advise you within a month.

Template 2: Governors

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the Board of Governors of the School, and the School will therefore have a legitimate interest for processing basic personal data and, if necessary, sensitive personal data. The data the School holds will be the minimum it requires.

We see the provision of personal data as necessary to safeguard you and the School as it will allow the necessary checks to be made.

The School will share your data with the following organisations who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, as follows:

- UAE government departments and regulatory authorities including ADEK and the Ministry of Education;
- IT software provider

It is not necessary for data to be shared with other countries.

The retention period for data on Governors to be held will be 25 years.

You have the right to withdraw your consent to data processing at any time.

We will obtain the data the School requires directly from you; should we need any additional data from other sources, we will advise you within a month.

Template 3: Employees of the School or applying to join the School

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the School, and the School will therefore have a legitimate interest for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to form and maintain the employment contract between you and the School.

We see the provision of personal data as necessary to properly employ you at the School and to administer and fulfill our obligations under the contract once you are an employee here.

The School may share your data with the following organisations who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, as follows:

- UAE government departments and regulatory authorities including ADEK, the Ministry of Education and the Ministry of Labour;
- DBS clearance provider and any provider of security or safeguarding checks
- Healthcare service provider
- IT software provider
- Insurance provider

It is not necessary for data to be shared with other countries. The exceptions to this are:

- Reference requests required to transfer to an alternative employer.
- International school trips that the School organises, in respect of which you will be contacted separately for consent which will be limited in time and content.
- To providers of security or safeguarding checks
- Requests from financial institutions

The retention period for employee data will be 10 years after your departure from the School. For those not employed by the School, data will be retained for three months.

You have the right to withdraw your consent to data processing at any time.

We will obtain the data the School requires directly from you, the exception to this will be reference requests for existing or previous employees; should we need any additional data from other sources, we will advise you within a month.

Template 4: Alumni and former parents

Routine contact with alumni will be through Graduway; and direct email will only be used as a method of contact if you have provided consent to be contacted in this way.

Should you give consent, data will be processed for the purposes of maintaining an accurate record of those who were educated at The British School Al Khubairat or parents of former students. The School will process only the minimum personal data to achieve this purpose.

The School will not share your data with any other companies or organisations.

It is not necessary to share your data with other countries.

The retention period for alumni data will be unlimited for as long as the School believes it has a relationship to serve with alumni.

You have the right to withdraw your consent to data processing at any time.

We will obtain the data the School requires directly from you; should we need any additional data from other sources, we will contact you first.