



DELHI PRIVATE SCHOOL, AJMAN

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Data Protection Policy

Delhi Private School Ajman collects and uses personal information about staff, pupils, parents and other stakeholders who come into contact with the school. This information is gathered so as to enable it to provide the best education and other associated functions which is part of the school. In addition to this, to ensure that the school complies with its statutory obligations, there may be a legal requirement to collect and use the data of students, staffs, parents and other stakeholders. The school will not violate human identity, human rights or privacy with the data that the school collects as per this policy.

Objectives of the Policy:

- To enable the fulfilment of the schools' vision of turning the school into a Smart School.
- To manage the data collected in accordance with a clear and specific methodology that is consistent with MOE guidelines.
- To enhance transparency and establish protocols to handle the data in a more secure manner
- To ensure that however the personal information is collected, used, recorded, and stored, the data is allocated correctly and securely and it will apply to all the information irrespective of whether it is held in paper files or electronically.
- To ensure that all the staff members involved with the gathering, processing and disclosure of personal data will be aware of the Data Protection Policy, their duties and responsibilities and will thereby, adhere to these guidelines.

1. Data Protection Ethics

1.1. DPS Ajman is determined to follow the Data Protection Ethics that are given below:

1.1.1. Personal data shall be processed fairly and lawfully.

1.1.2. Personal data shall be obtained only for one or more specified and lawful purposes;

1.1.3. Personal data shall be adequate, relevant and not excessive;

1.1.4. Personal data shall be accurate and where necessary, kept up to date;

1.1.5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes;

- 1.1.6. Personal data shall be kept secure and only the authorized personnel will be able to access the data.
- 1.2. The school is committed to maintain the above principles at all times. Therefore, the school will:
 - 1.2.1. Inform individuals why the information is being collected when it is collected.
 - 1.2.2. Inform individuals when their information is shared, and why and with whom it was shared.
 - 1.2.3. Check the quality and the accuracy of the information it holds.
 - 1.2.4. Ensure that information is not retained for longer than is necessary.
 - 1.2.5. Ensure that when obsolete information is destroyed that it is done so appropriately and securely.
 - 1.2.6. Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
 - 1.2.7. Share information with others only when it is legally appropriate to do so.
 - 1.2.8. Ensure our staff are aware of and understand our policies and procedures.

2. Obligations

2.1. Obligation of Students

The students of DPSA are obliged to ensure the safety of other students/ staff by following the protocols given below:

- 2.1.1. Students must not share the personal data of any student to a third party or to any external agency.
- 2.1.2. Students must not share or circulate pictures/ videos/ audios of student/ staff in any social media platform without his/her consent which will be considered as a violation of Acceptable Use Policy, Data Protection Policy and UAE Cyber Laws.
- 2.1.3. Students should be aware of the potential risk of saving their personal data in devices at school.

2.2. Obligation of Teachers

- 2.2.1. Teachers must not share the data collected from the students/ parents to anyone, unless, it is to the authorised school officials for the administrative procedures.
- 2.2.2. Teachers must have the data collected from the students/ parents in a secured/ encrypted folder or drive irrespective of whether it is held in paper files or electronically.
- 2.2.3. Students pictures/ videos must be captured only by the assigned staff as mentioned in the Acceptable Use Policy for Handling Social Media Accounts and these pictures/ videos should be considered sensitive in nature and must not be shared, displayed or uploaded keeping in mind the safeguarding issues.

- 2.2.4. Teachers must keep information of Students of Determination (SOD) confidential and must not share it with other external agencies. The data may be shared with the external agencies after proper observation and assessment by the special educator in consultation with the Principal.
- 2.2.5. Teachers must ensure that the data/ information related to the school is secured and the school email/ ERP accounts are logged out before sharing their personal system with anyone.
- 2.3. Obligation of Parents
 - 2.3.1. Parents must give accurate and updated information regarding the student for the smooth functioning of the administrative procedures.
 - 2.3.2. Parents must not take pictures/ videos in the school premises of any other student/ staff. Pictures or videos of functions/ events will be taken by the school and the copy of these can be acquired from the school.
 - 2.3.3. Parents have the right to request for the information that the school holds on their student(s) and the school ensures that the information is not shared to any external agencies for marketing, advertising or any other purpose.
- 2.4. Obligation of Staff
 - 2.4.1. Only the necessary amount of information that is required to provide an adequate service will be gathered and stored in the school system.
 - 2.4.2. The administrative staff will inform the parents/ staff of the reason for collecting their data and the uses to which their data is processed.
- 3. Data Collected**
 - 3.1. Students Records

Data that is collected and recorded at the time of the enrolment and may be compiled during the course of the students' time in the school will include the following information:

 - 3.1.1. Name, address and contact details
 - 3.1.2. Date and place of birth
 - 3.1.3. Name and address of the parents and their contact details
 - 3.1.4. Copy of Emirates ID and Passport
 - 3.1.5. Religion
 - 3.1.6. Information of previous academic record
 - 3.1.7. Medical, Psychological and/or Psychiatric Fitness declaration
 - 3.1.8. Attendance records
 - 3.1.9. Photographs and videos of students are managed in line with the Acceptable Use Policy of the school
 - 3.1.10. Academic record
 - 3.1.11. Record of disciplinary issues
 - 3.2. Staff Records
 - 3.2.1. Name address and contact details
 - 3.2.2. Name and contact details of Emergency contact

- 3.2.3. Copy of Emirates ID and passport
- 3.2.4. Religion
- 3.2.5. Details of Educational Qualification (Certificate, Transcript, etc.)
- 3.2.6. Details of Employment Experience (Experience Certificate, References, etc.)
- 3.2.7. Records of any accidents/medical concerns
- 3.2.8. Records of any memo or warning letter issued by the school at the time of their service in the school
- 3.2.9. Details of approved absences attested by the ministry

4. Storage of Data

- 4.1. Manual Records are kept in a secure, locked file cabinet only accessible staff who are authorised to use the data.
- 4.2. The ERP data is stored in Amazon Cloud Server.
- 4.3. User data is stored in local server and is synchronised with Microsoft Cloud

5. Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every year. The policy review will be undertaken by Online Safety Group, SLT and the Principal.