

Fair Processing Notice

This Fair Processing Notice explains how the British International School uses the personal data of students and parents. Please read it carefully and if you have any questions regarding your personal data, or its use, please contact the school directly or speak to our Online Safety Leader.

‘Personal data’ refers to information (held electronically) about a particular person, including sensitive information regarding their background and health and wellbeing etc.

What is processing? Throughout this notice, we refer to the term ‘processing’. In terms of personal data, this means any action that is performed on the data; examples of processing include:

- Collection
- Recording
- Organisation
- Structuring
- Storage
- Alteration
- Retrieval
- Consultation
- Use
- Disclosure
- Dissemination
- Restriction
- Erasure
- Destruction

UAE Cyber Laws

The British International School, Ajman is committed to supporting and complying with all Federal Laws of the UAE related to Cyber Crimes and Child Protection which give clear guidelines on what is and is not acceptable. The school is committed to protecting all children in its care by collecting, using, managing, storing and sharing personal data in an ethical manner and in line with all laws of the UAE and any other relevant international laws.

The British International School acknowledges the general principles of processing, which require that personal data shall:

- Be processed fairly, lawfully and transparently
- Be processed for specified and lawful purposes and must not be further processed in any incompatible manner
- Be adequate, relevant and not excessive for those purposes
- Be accurate and, where necessary, kept up to date
- Not be retained for longer than is necessary for the purpose for which it is processed
- Be processed in a manner that ensures its security appropriately, including protecting against unauthorised or unlawful processing, loss, destruction or damage

The types of personal data we collect and use

The British International School collects and processes personal data about prospective, current and past students and their parents and siblings; staff, suppliers and contractors, volunteers and other individuals connected to or visiting the school.

The personal data we collect takes different forms; it may be factual information, expressions of opinion, images or other recorded information which relates to a living individual.

The British International School collects the following personal data:

- Basic personal data relating to parents, appointed guardians, students and their families, such as full name, address, date of birth, email address and contact information
- Language and nationality of students
- Safeguarding information (such as court orders and professional involvement of outside agencies)

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- Attendance information (such as classes attended, number of absences, absence reasons and any previous schools attended)
- Academic assessment and attainment data (including examination results)
- Behavioural information (such as suspension and any relevant alternative provision put in place)
- Images including photos, videos and CCTV footage
- General information regarding students' educational activities such as behavioral records, test and examination results and academic reports
- Health and medical information of students and staff (such as medical records, dental health, allergies, medication, dietary requirements and any special educational needs)
- Race or ethnic origin
- Religion

The British International School will process your personal data for the following purposes:

- For the provision of education to students including, but not limited to, the administration of the school curriculum and timetable, monitoring of student progress and educational needs, reporting on these needs to parents, administration of students' entries to public examinations and providing references for children who are applying for further study
- For the safeguarding of students' wellbeing and the provision of pastoral care, welfare and health care services by the school
- For the provision of educational support and related services to students (and parents) including, but not limited to, the maintenance of discipline, provision of careers and library services, administration of sports events and teams, school trips, provision of the school's IT and communications systems and virtual learning environment
- To assess the quality of our services
- To keep children safe
- For compliance with all legislation and regulations conferred on us by the Government of the UAE
- For the operational management of the school, including, but not limited to, the administration of invoices, the management of school property, the management of security and safety arrangements (including the use of CCTV footage and the monitoring of the school's IT and communications systems in accordance with our Acceptable Use Policy), management planning and forecasting, research and statistical analysis and the implementation of the school's rules and policies for students, staff and volunteers; and
- For the promotion of the school through its website and social media communications

Our Lawful Basis for Processing

The lawful basis for collecting and processing each category of personal data and special category data is dependent upon the specific processing activity in question. However, under the Law, the lawful bases we rely on for the majority of processing (including student learning and pastoral care) are:

- The processing is necessary for the exercise of a right, power or duty imposed by law;
- The processing is necessary for the exercise or performance of a public function or task carried out in the public interest by a public authority;
- The processing is necessary for a health or social care purpose;
- The processing is necessary to protect the vital interests of the data subject or other individual;
- Consent (e.g. use of images on social media, use of specific applications); and
- The processing is necessary for the purposes of equal opportunity

How we collect Student and Parent data

We collect most of the personal data we process directly from the students and parents themselves. In some cases, we collect data from third parties, such as;

- Health professionals
- Previous schools
- Third party service providers who support the school
- Other organisations who may be working with the student or family

No personal data is collected from any publicly available source.

Sharing of personal data

In some circumstances, personal data held by the school may be transferred to another organisation within the UAE or another associated third party. The school may share data with the Ministry of Education, the Ministry of Health and any other UAE government department as necessary. From time to time, there may be other educational organisations that the school shares data with in accordance with all laws and guidelines.

The British International School will only share data when there is a lawful basis to do so. We do not transfer data outside of the UAE unless we are satisfied that personal data will be afforded an equivalent level of protection.

Storage and retention of personal data

Personal data and special category data will be retained in accordance with any UAE government requirements and the Schools' Retention and Disposal Schedule. In general, students' individual education files will be held until the student is 25 years old. After this time, only their name, dates of attendance and public examination results will be held. Safeguarding information may be held for up to 50 years.

How we keep your data safe

All personal data held by The British International School is protected and securely stored and, in order to prevent unauthorised or unlawful processing, the school has put in place suitable physical, digital and managerial procedures to safeguard and secure the information that is collected. Access to electronic or paper records is tightly controlled and all employees are vetted in a manner commensurate with the role that they are expected to undertake. Protocols are followed to ensure that employees only have access to areas and documents as required to undertake their role. Access to records is monitored and effectively managed.

Requesting access to your personal data

Parents and students have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact us directly or speak to our Online Safety Leader.

Withdrawal of consent

For any instances where we are processing your personal data with your consent, you have the right to withdraw that consent. If you wish to withdraw your consent, or you are unhappy with our use of your personal data, please let us know by contacting the school or our Online Safety Leader.

Date of Review of this Notice: **January 2022**

Date of Next Review of this Notice: **January 2023**

Approved by the Management of British International School Ajman