



DATA PROTECTION POLICY

Ambassador School, Sharjah

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Custodian of this policy	Mr. Irish Tiffany (IT Administrator)
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Owner of this policy	Mr. Arogya Reddy (Principal)
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1. Purpose

The Ambassador School, Sharjah collects and manages personal information about all of its Parent/Students, and has a range of legislative and ethical responsibilities in regard to maintaining the confidentiality of Parent/Students' personal information. These include, but are not limited to, responsibilities and/or requirements under United Arab Emirates (UAE) law, with the SPEA.

The privacy of this information is a critical component of the SAS's relationship with its Parent/Students, and the SAS recognizes its responsibility to collect, manage, use, store and disclose personal data in adherence with legislative and other requirements, and in accordance with community expectations of best practice.

Personal information is thus confidential, and will not be used or disclosed except in accordance with this policy.

This policy does not extend to material that is by its nature public, such as the fact that an award is conferred.

2. Definitions

Parent/Student means any current or former Parent/Student of the Ambassador School, Sharjah.

Personal Information, refers to information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. For the SAS's purposes, this includes all documentation provided by the SAS to the Parent/Student before, during or after their studies and includes, but is not limited to; admission forms and associated documentation, letters, assignments, examinations, assessments and results, any Parent/Student results identified by Parent/Student number, practicum or internship details.

Sensitive Information means:

personal information about an individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, health status (either physical or emotional), disability, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, or criminal record;



Record means:

- (a) a document; or
- (b) a database (however kept); or
- (c) a photograph or other pictorial representation of a person;

but does not include:

- (d) a generally available publication; or
- (e) anything kept in a library, art gallery or museum for the purposes of reference, study or exhibition; or
- (h) letters or other articles in the course of transmission by post or electronically
- (i) any information that already exists in the public domain.

3. Guiding Principles and Legislative Requirements

- 3.1 The interests of the individual concerned and the preservation of confidentiality and privacy are the paramount considerations in interpretation of this policy.
- 3.2 The Ambassador School, Sharjah respects a Parent/Student's right to know how his or her personal information will be used, stored and disposed.
- 3.3 The Ambassador School, Sharjah supports responsible and transparent handling of personal information; however, the confidentiality requirements under this policy will in certain instances be overridden by legal obligations of disclosure. Compliance with such obligations is mandatory.
- 3.4 Certain types of information may be subject to additional confidentiality standards, over and above those provided by this policy. These may be provided by other SAS policy documents (for example the SAS's Anti-Bullying policies), or by legislative requirements.

4. Collection of Personal Information

- 4.1 The Ambassador School, Sharjah collects and holds a range of personal information about all of its Parent/Student. This includes, but is not limited to:
 - Personal details: name, Parent/Student ID number, contact information, age, enrolment status, digital images, etc.
 - Academic records: enrolment details, assessment results, academic standing.
 - Personal welfare information: emergency contacts, medical reports, financial information.
 - Health Details: Whether in regard to insurance or personal files generated by the Medical Centre in the SAS.
 - Passport/Visa details: relevant documentation and details held, lodged with and received from the parent.
 - Breaches of student behaviour (academic or non-academic), attendance or

satisfactory academic performance.

4.2 Information collected is used for a variety of purposes, including, but not limited to:

- Parent/Student admission;
- Enrolment and academic progression;
- Program and administration;
- Communications with Parent/Students;
- Statistical purposes, such as SAS planning;
- Scholarship administration;
- Provision of Parent/Student services;
- Conduct of Parent/Student elections;
- Financial management;
- Mandatory and/or discretionary reporting to external bodies/agencies, as detailed in procedural Section 9 below;
- Promotion of the SAS - in the case of photographic records and other images. This will occur only with the explicit written permission of the individuals involved.

4.3 The SAS will collect personal information only where it is necessary for one of more of our functions or activities. Where personal information is collected, all reasonable steps will be taken to inform the individual of:

- The purpose for which the information is collected;
- Any person to whom, or body or agency to which the SAS usually discloses information of that kind;
- Any law that requires or authorises particular information to be collected.

4.4 The SAS will take all reasonable steps to ensure that personal information collected is accurate, relevant, up-to-date, complete, and not misleading. To this end, the SAS will take reasonable steps to allow individuals to correct accurate information as appropriate.

5. Storage of Personal information

5.1 All Parent/Student records will be stored as per the schedule.

5.2 The SAS will take all reasonable steps to protect records of personal information from misuse, loss, unauthorised access, modification or disclosure.

5.3 Staff access to records of personal information will be on a "need to know" basis: only staff members who need the information in order to carry out their duties and responsibilities, in the personal and/or academic interests of Parent/Students, will be permitted to have access to Parent/Student files.



- 5.4 Staff who are granted access to records of personal information will be made aware of the strict conditions set out under the relevant UAE legislation for access to records of personal information that have been collected for any purposes. Staff will be made aware that
- disclosing such personal information, outside of the requirements of official duties;
 - copying a record of such personal information outside of the requirements of official duties; and
 - causing unauthorised access to such personal information held in a computer system are prohibited and may lead to disciplinary action imposed by the Ambassador School, Sharjah and/or legal action under relevant UAE legislation.
- 5.5 Where information is no longer needed for any legitimate purpose it will be destroyed.

6. Use and Disclosure of Personal Information

- 6.1 Personal information will be used only for a purpose to which it is relevant. Where information has been obtained for a particular purpose, it will not be used for any other purpose, unless:
- The individual concerned has consented to its use;
 - Use of the information is required by law;
- 6.2 The SAS believes it is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person.
- 6.3 The SAS will not disclose personal information about Parent/Students to people, bodies or agencies outside the SAS (including parents, spouses or other relatives of the Parent/Student), or to staff who have no need of the information, unless:
- The Parent/Student has given written permission for the SAS to disclose the information;
 - The SAS has taken reasonable steps to inform the Parent/Student that information of that kind is usually passed on to those people, bodies or agencies; including but not limited to; the UAE Government, the UAE Education Ministry.
 - The SAS believes the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person.

7. Sensitive Information

The SAS will not collect sensitive information, unless such collection is required by the law, or occurs with the consent of the individual Parent/Student (eg:- health records, counselling information).

8. Individual's Right of Access to Personal Records

- 8.1 The SAS will take reasonable steps to allow individual Parent/Students to view the personal information the SAS holds about them.
- 8.2 Parent/Students who wish to view any other records of personal information kept on them by the SAS may apply to do so through the Registrar's Office.
- 8.3 In particular, where SAS collects and holds personal information for the purposes of administering the SPEA Standards and/or UAE laws, Parent/Students will have the right to be allowed to view the individual personal information that the SAS collects for those purposes and holds about them, except where the SAS is required or authorised by UAE legislation to refuse to provide the individual with access.

9. Disclosure of Personal Information Records

The SAS will regularly provide personal information on Parent/Students to:
The SPEA as required for administrative purposes.

This will include information on all Parent/Students, regarding:

- enrolments and Parent/Student load (including information on characteristics of enrolled Parent/Students);
- academic programs being undertaken;
- completion of academic programs

10. Grievances regarding Personal Information Records

Grievances regarding any aspect of the SAS's collection, storage, use and disclosure of Parent/Students' personal information must be made, in writing, to the School Principal.

10.1 General Principles of Grievance Resolution

The following general principles underpin the SAS approach to the resolution of grievances:

- SAS is committed to the early and informal resolution of grievances. Parent/Students should therefore attempt to resolve any grievances in an informal way with the person involved before initiating formal grievance resolution processes.
- Parties involved in a grievance must participate in the grievance resolution process in good faith.
- Grievance resolution processes should be applied fairly, flexibly and expeditiously.
- All parties involved in a grievance should be treated with respect and impartiality.
- The principles of natural justice should be observed. To this end the parties involved in a grievance have a right to a fair hearing and to have a decision made by an unbiased decision-maker.
- The confidentiality of parties involved in a grievance should be respected at all times, subject to the need to fully investigate the matter and any legal



requirements for disclosure.

10.2 Possible outcomes

After examining the relevant documentation and speaking to the Parent/Student and other relevant parties where appropriate, the school principal may:

- 10.2.1 refuse to take the matter further if there are insufficient grounds for the grievance;
- 10.2.2 conciliate the matter in accordance with section 10.3 below; or
- 10.2.3 take appropriate action in accordance with section 10.4 below.

10.3 Conciliation

The school may clarify the issues with the Parent/Student and suggest possible directions for resolution of the grievance.

10.4 Decision

Where the school decides that due process has not been followed he/she may:

- a) conciliate the matter in accordance with section 10.3 above; or
- b) make a decision to resolve the matter.

10.5 Parent/Student to be notified

The school must notify the Parent/Student, in writing, of his/her decision regarding the matter.

11. Review

This policy will be reviewed to ensure appropriateness not less than once every two (2) years from the date of creation or most recent review.

Staff Consent

I hereby acknowledge that I have read and been informed about the content, requirements, and expectations of the Privacy Policy. I have received a copy of the Data Protection Policy and agree to abide by the guidelines as a condition of my employment at the organisation.

Staff Name: _____

Signature: _____

Date: _____