

NEWTON INTERNATIONAL ACADEMY SMASH



DATA AND INFORMATION PROTECTION POLICY

POLICY REVIEWED

July 2025

POLICY TO BE REVIEWED

July 2026





Data and Information Protection Policy

The purpose of this policy is to ensure that NIA Smash processes personal data fairly, lawfully, and transparently, and complies with all applicable data protection legislation to safeguard the rights and freedoms of individuals.

1. Introduction

In order to operate efficiently, NIA Smash must collect and use information about individuals it works with, as well as the pupils it educates. This includes members of the public, current, former, and prospective employees, clients, customers, and suppliers. In addition, the school may be legally required to collect and use certain information to comply with the Ministry of Education requirements.

Protecting the privacy and personal data of individuals is essential to maintain trust, meet legal obligations, and safeguard the rights of pupils, staff, and all stakeholders.

NIA Smash, and any person who handles personal data on its behalf (including all staff), must comply with this policy and, in particular, with the data protection principles.

This policy applies to all personal data processed by NIA Smash, in any format or medium, and to all staff, contractors, and third parties acting on behalf of the school.

2. Scope

This policy applies to all Personal Data created, collected, or held by the School, regardless of its format (for example, paper records, electronic files, emails, photographs, CCTV footage, or other media) and regardless of where or how it is stored (such as on ICT systems, databases, shared drives, email accounts, physical filing cabinets, or personal drawers).

Personal Data means any information relating to a living, identifiable individual, including information that directly or indirectly identifies them. It covers both factual data and opinions about an individual, and may exist in electronic or manual records.

This policy supports compliance with applicable data protection legislation.

3. Responsibilities

The Principal holds overall responsibility for ensuring that the school complies with applicable data protection legislation. This includes accountability for information governance, data security, and the effective implementation of data protection procedures throughout the school. The Principal may delegate day-to-day operational tasks to designated staff, such as the Data Protection Officer, but retains ultimate accountability.

4. The Requirements

All school employees processing personal data must comply with principles of good data protection practice. These principles require that personal data:



1. Shall be processed fairly, lawfully, and transparently;
2. Shall be obtained only for one or more specified and lawful purposes and shall not be further processed in a manner incompatible with those purposes;
3. Shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;
4. Shall be accurate and, where necessary, kept up to date;
5. Shall not be kept for longer than is necessary for the purposes for which it is processed;
6. Shall be processed in a manner that ensures appropriate security of the data, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage;
7. Shall respect the rights of data subjects, including their rights to access, rectify, or erase their personal data, where applicable.

5. Privacy Notices

Whenever information is collected about individuals they must be made aware of the following at that initial point of collection:

- The identity of the data controller, e.g. the School;
- The purpose that the information is being collected for;
- Any other purposes that it may be used for;
- Who the information will or may be shared with.

6. Data Protection Officer

The School shall nominate a Data Protection Officer. In NIA Smash, this is Mr. James Browne.

7. Data Breaches

All employees, contractors, agents and representatives, volunteers and temporary staff must immediately report a security incident or data breach to the Principal.

8. Consent

Where the School processes data with consent (for example, to publish photographs of children, to send direct marketing emails about school uniform for sale) it will ensure that the consent is freely given, specific, informed and unambiguous, and the consent is recorded.

9. Information Security

All members of staff should be constantly aware of the possibility of personal data being seen or accessed by unauthorised personnel. For example, possibilities may arise when computer screens are



visible to the general public; files may be seen by the cleaners if left on desks overnight (all papers must be locked in cabinets when not in use).

All members of staff should take care when transporting paper files between sites. No personal data is ever to be left unattended off site e.g. in a car overnight, on view to family members when working at home.

All members of staff should take care when emailing personal data and always check the email address is correct and the right attachment has been attached. When copying to several people externally, all members of staff should always use the BC field and not the CC field or create a group.

10. Maintenance of Up to Date Data

Out of date information should be discarded if no longer relevant. Information should only be kept as long as needed, for legal or business purposes. In reality most relevant information should be kept for the period during which the person is associated with the School plus an additional period which the School has determined. Under GDPR the School must produce a Retention and Disposal Policy to clarify this.

11. Photographs

Whether or not a photograph comes under the data protection legislation is a matter of interpretation and quality of the photograph. However, the School takes the matter extremely seriously and seeks to obtain parents' permission for the use of photographs outside the School and, in particular, to record their wishes if they do not want photographs to be taken of their children.

To be reviewed July 2026

Newton International Academy, Smash

www.newtonschools.sch.qa

An International community of learners striving for excellence and celebrating success

