



## **Data Protection Policy 2021-22**

### **1. Introduction**

In order to operate efficiently NBA Al Dafna has to collect and use information about people with whom it works and the pupils it provides an education to. These may include members of the public, current, past and prospective employees, clients and customers, and suppliers. In addition, it may be required by law to collect and use information in order to comply with the requirements of the Ministry of Education.

The School, and any person who handles personal data on behalf of the school (including all staff) must comply with this policy and in particular the data protection principles.

### **2. Scope**

This policy applies to all personal data created or held by the School in whatever format (e.g. paper, electronic, email, microfiche, film) and however it is stored, (for example ICT system/database, shared drive filing structure, workbooks, email, filing cabinet, shelving and personal filing drawers).

Personal data is information about living, identifiable individuals, or an identifier or identifiers that can be used to identify a living individual. It covers both facts and opinions about the individual. Such data can be part of a computer record or manual record.

### **3. Responsibilities**

Overall responsibility for ensuring that the School meets the statutory requirements of any data protection legislation lies with the Principal who has overall responsibility for information management issues.

### **4. The Requirements**

Any school employees processing personal data must comply with principles of good practice. This good practice centers around the following provisions, namely that data:

1. Shall be processed fairly and lawfully and transparently;
2. Shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes;
3. Shall be adequate, relevant and not excessive in relation to the purpose or 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 that purpose or those purposes;
6. Shall be kept secure i.e. protected by an appropriate degree of security;



## **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. At NBA Al Dafna, this is Mr. Graham Wallis.

## **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.

## **12. Reviewing of the Policy**

This policy is to be reviewed annually in association with the P.T.A.

Reviewed September 2021