



## Data Protection Policy

### Introduction:

This policy is intended to provide information about how the School will use (or "process") personal data, regardless of whether it is in paper or electronic format.

It aims to ensure that all personal data collected about staff, students, parents' visitors and other individuals is collected, stored and processed in accordance with current data protection policy.

It applies in addition to the School's terms and conditions, and any other information the School may provide about a particular use of personal data.

### Responsibility and Data Protection:

Pamir Private School has the overall responsibility for ensuring that the School complies in the confidentiality and protection of all data of staff, students, parents and visitors.

### Data Protection Principles:

The collected personal data shall be:

- Fairly and lawfully processed in a transparent manner.
- Processed for limited, legitimate and specific purposes.
- Adequate, relevant and not excessive.
- Accurate
- Not kept longer than necessary
- Processed in accordance with the data subject's rights
- Kept secure

### Data Processing:

Pamir Private School is entitled to process relevant personal data regarding students and their parents and guardians based on the need and requirement of data.

Data Processing can be automated or manual which can include the following steps:

- Collecting
- Recording
- Organizing
- Structuring
- Storing
- Adapting
- Altering
- Retrieving

- Disseminating
- erasing or destroying
- sharing

**The School is allowed to process personal data for the following purposes:**

- The provision of education as a primary function
- Educational support purposes
- Staff administration
- Advertising, marketing and public relations
- Staff, agent and contractor information
- School administration

**Personal data processed by the School may include (but is not limited to):**

- Personal details such as home address, contact details, date of birth and next of kin
- Identification documents
- Pupils' performance at School, including assessments, reports, examination reports, discipline record, attendance information
- Special Educational Needs report or Psychological Report
- Medical records and information, including details of any illnesses, allergies or other medical conditions suffered by a child
- Safeguarding information
- Details of any support received, including learning support, therapists, counselling, care plans and support providers
- Sensitive personal data such as ethnic group, religious beliefs
- Students and staff pictures and, videos can only be shared in accordance with the existing Digital Policy and Digital/Social Media consent from parents.
- Performance and Results Records
- CCTV images for security purposes

Where sensitive personal data is processed by the School, the explicit consent of the appropriate individual will generally be sought in writing and secure the approval of the Principal.

**Data Accuracy and Security Responsibilities**

- The School will ensure that all personal information held in relation to an individual is accurate.
- Parents and staff must notify the School of any changes to information held about them, including contact details.
- Parents and staff have the right to request that inaccurate information about them is erased or corrected.
- Parents and staff have the right for their data to be removed when no longer used by the School.
- The School will take reasonable steps to ensure that the designated personnel staff and the Principal will only have the access to personal data and responsibility in respect of

- data of students, parents or guardians, and staff.
- All staff will be made aware of this policy.
- The School will ensure that all personal information is held securely and is not accessible to unauthorized persons.
- Students and Staffs data must be protected by physical means (locked cabinets or locked rooms/offices).
- All data/information pertaining to students, staffs is not to be removed from the School site without the express permission of the Principal.
- School used CCTV in various locations around the school site to ensure it remains safe. We do not need to ask individuals' permission on our use of CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.
- Photographs and Videos information relating to this is conjunction with the existing Digital Policy.
- Parents, students and staff have the right to request rectification of any data that is inaccurate or incomplete.
- Parents and staff have the right to have their personal data erased and to prevent further processing if with the following valid reason:
  - It is no longer required for the purposes for which it was collected
  - Consent is withdrawn
  - The personal data is being unlawfully processed
  - The personal data must be removed in order to comply with a legal obligation
  - Individuals may request a restriction of further processing of personal data and/or object to processing on specific grounds.

### **Procedure on Change of Information**

- Parents and staff wishing to access their personal data should put their requests in writing to the Principal for approval.
- The School will take reasonable steps to confirm the identity of the individual making the request and respond to any such written requests without delay.
- The School will provide such information without charge.
- The School will treat as confidential any reference given by the parents and staff for the purpose of the education, training or employment, or prospective education.
- The School may receive requests from third parties to disclose personal data that it holds about pupils, their parents or guardians with authentic and legal documents.
- To give a confidential reference relating to a pupil to any educational institution.
- To disclose details of a pupil's medical condition, where it is in the students interests to do so, for example for medical advice, insurance purposes or to organizers of school trips

### **Data Erasure and Disposal**

- Student's data that is no longer needed will be disposed of securely in accordance to the wishes of the data subject and the approval of the Principal.
- Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

### **Applicability of the Policy:**

This policy applies to all members of our school community, which includes students, teaching and non-teaching staff, parents, and visitors of the school.

### **Related Policy:**

Digital Media Policy

Child Protection and Health Policy

### **Monitoring and Review:**

The Senior Leadership Team will monitor and evaluate the outcomes of this policy to ensure that our students are taught the importance of Data Protection Policy. This policy will be reviewed every 6 months, or more often if necessary, due to changes in regulations or circumstances.

**CONFORME:**

**We understand the Data Protection Policy.**

**We accept and we will adhere to every rule about it.**

\_\_\_\_\_  
**Parents Name and Signature**

\_\_\_\_\_  
**Student Name**

\_\_\_\_\_  
**Class**

\_\_\_\_\_  
**Date**

