



Victory Heights Primary School  
City of Arabia  
**Data Protection and Privacy  
Policy**

**Version Date:** April 2025

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**Responsible SLT:** Head of IT

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## **Equal Opportunities Statement**

Victory Heights Primary School City of Arabia is committed to upholding the privacy rights of all individuals, regardless of age, gender, race, nationality, religion, or ability. This policy applies equally and fairly to all members of our school community and ensures that personal data is handled with respect, integrity, and in full compliance with UAE laws.

## **Aim**

To safeguard the personal data of pupils, parents, staff, and stakeholders at VHPS-COA by implementing practices that are transparent, secure, and in accordance with the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL).

## **Purpose**

This policy outlines how Victory Heights Primary School City of Arabia collects, stores, uses, shares, and protects personal data. It also defines individuals' rights in relation to their data and the responsibilities of the school in ensuring that privacy is maintained.

## **Scope**

This policy applies to:

- All staff, contractors, and service providers working with VHPS-COA
- All parents and guardians who provide data to the school
- All pupils and alumni whose personal information is processed by the school
- All data collected, whether in digital or paper form

## **Legal Framework**

This policy is guided by:

- Federal Decree-Law No. 45 of 2021 (UAE PDPL)
- KHDA Guidelines on data handling and confidentiality
- Dubai Digital Authority standards on cybersecurity in education

## Definitions

- **Personal Data:** Any information that relates to an identified or identifiable individual (e.g., names, ID numbers, health records).
- **Sensitive Personal Data:** Includes racial or ethnic origin, health information, biometric data, or details related to a child's wellbeing.
- **Data Subject:** The individual whose personal data is being processed.
- **Processing:** Any operation carried out on personal data (e.g., collecting, storing, altering, deleting, disclosing).

## Data Collection

VHPS-COA collects personal data for the following legitimate purposes:

- School admissions and enrolment
- Educational provision and learning support
- Safeguarding and medical care
- Attendance and assessment tracking
- Communication with parents
- Compliance with regulatory requirements

## Types of Data Collected

- Student data: name, age, address, contact details, medical records, academic performance
- Parent/guardian data: contact details, residency status, relationship to student
- Staff data: employment records, qualifications, payroll and identification details

## Data Use and Sharing

Personal data is:

- Only used for the purpose for which it was collected
- Shared internally on a need-to-know basis
- Not shared with external parties unless:
  - Required by law or regulation (e.g., KHDA)
  - Required for school operations (e.g., bus service providers, educational platforms)
  - Required to support the welfare and safeguarding of a student, including the routine sharing of safeguarding information with other schools during transition or in accordance with child protection protocols
  - Explicit consent has been obtained from the data subject

Third-party providers are subject to contractual obligations to comply with data privacy laws and ensure data security.

## **Data Storage and Retention**

- Data is securely stored using encrypted digital systems or locked physical storage
- Access is limited to authorised personnel only
- Personal data is retained for the duration necessary to fulfil its purpose, and securely deleted thereafter in accordance with school retention schedules

## **Data Security**

- Firewalls, encrypted systems, and password protection safeguard all digital records
- Staff receive regular CPD on data protection best practice
- Physical files are stored in locked, access-controlled areas

## **Rights of Data Subjects**

Under the UAE PDPL, individuals have the right to:

- Access their personal data
- Request correction of inaccurate or outdated information
- Withdraw consent for non-essential data processing
- Request deletion of personal data, where appropriate

All requests should be submitted in writing to the Principal or designated Data Protection Lead.

## **Data Breaches**

In the event of a data breach:

- The breach will be recorded and investigated
- Affected individuals will be notified if there is a risk to their data or rights
- The school will take immediate steps to mitigate harm and prevent recurrence

## Monitoring and Compliance

The implementation and effectiveness of this policy will be monitored regularly in line with the Policy Review Policy. Updates and changes will be documented in the Version Control Table to ensure transparency and continuous improvement.

### Version Control Table

**Policy Title:** Data Protection and Privacy Policy

**Policy Owner:** Head of IT

**Last Approved By:** Primary Leadership Team

Version Number	Date Approved	Approved By	Changes Made	Next Review Date
1.0	April 2025	SLT	New Policy	August 2027