

## STUDENT CONFIDENTIALITY AND PRIVACY POLICY

### PURPOSE

SBS manages personal information about all of its students, and has a range of legislative and ethical responsibilities in regard to maintaining the confidentiality of students' personal information.

The privacy of this information is a critical component of the school's relationship with its students, and SBS recognise 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.

### COLLECTION OF PERSONAL INFORMATION

SBS collects and holds a range of personal information about all of its students. This includes, but is not limited to:

- ✓ Personal details: name, 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.
- ✓ Program information (agreed starting date, actual start date, expected completion date, and any termination of enrolment prior to the expected completion date; any change to the identity or duration of the program).
- ✓ Health Details: Whether in regard to insurance or personal files generated by the School Clinic.

### STORAGE OF PERSONAL INFORMATION

- ✓ All student records will be stored as per the schedule in the Records Matrix policy.
- ✓ The school will take all reasonable steps to protect records of personal information from misuse, loss, unauthorised access, modification or disclosure.
- ✓ 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 students, will be permitted to have access to student files.
- ✓ 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 SBS in Dubai and/or legal action under relevant UAE legislation.

- ✓ Where information is no longer needed for any legitimate purpose it will be destroyed in accordance with the confidentiality clause.

## USE AND DISCLOSURE OF PERSONAL INFORMATION

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;
  - ✓ The School 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.
2. SBS will not disclose personal information about students to people, bodies or agencies outside the school (including parents, spouses or other relatives of the student), or to staff who have no need of the information, unless:
  - ✓ The student has given written permission for the school to disclose the information;
  - ✓ SBS has taken reasonable steps to inform the 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 KHDA.
  - ✓ The school 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.

## DISCLOSURE OF PERSONAL INFORMATION RECORDS

- The school will regularly provide personal information on students as required by KHDA & DHA.
- The school will only release information about individual students under certain circumstances to the following:
  - ✓ The police. The school may be under a duty to provide information on request for the enforcement
  - ✓ The court. The school may be requested under subpoena or other order to provide information related to a civil legal action;

**Implementation Date: September 2020**

**Review Date: September 2021**

Reviewed by: \_\_\_\_\_

**May Ann Angeles, DHA-RN**  
Lead School Nurse

Approved By: \_\_\_\_\_

**Zara Harrington**  
Principal