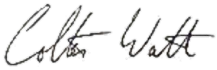







Title: **Policy for Managing Data Protection
in QatarEnergy Schools**

Status: **New**

Approval Date: **January 2021**

Department	Prepared by		Reviewed by	Approved by
Human Capital Education				 Digitally signed by ABDULAZIZ MOHAMMED A E AL-MANNAI Date: 2022.04.18 11:55:47 +03'00'
January 2020	VHE/1	VHE/2	VHE	VH

*“Our vision is for our students to be high achieving, healthy and happy individuals,
well prepared to take their place as global citizens and leaders of the future.*

CONTENTS

Foreword

1. Purpose
2. Scope
3. Definitions/Abbreviations
4. Responsibilities
5. Compliance

FOREWORD

This document has been developed by the Education Section (VHE) of the Human Capital Directorate (VH) and circulated for review by stakeholders before endorsement for use by the Executive Vice President (EVP) for Human Capital.

This document is published for use by the Education Section of the Human Capital Directorate. This policy is an operational/business level policy which is aligned with the QatarEnergy Values. The policy document should be read alongside the Procedure Document for Managing Data Protection in QatarEnergy Schools. The policy also takes into consideration Article (17) of Qatari Law No 13/2016 on the Protection of Privacy of Personal Data.

This document in its present form reflects, as far as possible, the current corporate requirements.

This document is subjected to periodic review to re-affirm its adequacy or to conform to any changes in the corporate requirements or to include new developments on its subject matter.

All comments/views, recommendations etc. regarding this document should be forwarded to the Head, Education Section.

POLICY STATEMENT

QatarEnergy acknowledges the importance of ensuring that the collection, storage and use of all personal data pertaining to students, staff and parents is in accordance with the General Data Protection Regulation (EU) 2016/79 (GDPR) and Article (17) of Qatari Law No 13/2016 on the Protection of Privacy of Personal Data. QatarEnergy Schools respect the rights of individuals to have their private information kept safe and will take all necessary steps to comply with the appropriate guidance to achieve this aim.

1. PURPOSE

- 1.1 The policy is aimed at ensuring personal data is processed lawfully, fairly and in a transparent manner and that the purpose for the collection of this data is clearly specified.
- 1.2 The policy will also outline the steps to be taken so that the storage of personal data is limited to fulfil the purposes for which it is processed and that data is accurate and is kept up to date.
- 1.3 The policy will outline the length of time that personal data shall be kept and how data will be processed in such a way as to be kept secure. GDPR states that personal data be kept for no longer than is necessary for the purposes for which it is processed (see Procedure Document).

2. SCOPE

- 2.1 This policy applies to all the personal data of all students, staff or parents in QatarEnergy Schools, regardless of whether it is in paper or electronic format.
- 2.2 This policy applies to all staff and to external organisations or individuals working on behalf of QatarEnergy Schools.
- 2.3 The policy applies to photographs and video images of students, written consent will be obtained from parents should these images be used for communication or marketing materials.
- 2.4 Any photographs and videos taken by parents at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos with other students are not shared publicly on social media for safeguarding reasons, unless all the relevant parents (or students where appropriate) have agreed to this.

3. DEFINITIONS/ABBREVIATIONS

- 3.1
 - Schools - QatarEnergy schools at Dukhan and Mesaieed
 - Principal - Principal of a QatarEnergy School
 - Head of School - Designated Head of Primary/Secondary School
 - Senior Leader - Member of school senior management team
 - GDPR - General Data Protection Regulation (EU)
 - Personal data - anything relating to a person that identifies them
This includes both physical records and digital records
 - DPO - Data Protection Officer

In a school, examples of personal data include:

- Names of staff and students.
- Dates of birth.
- Photographs of staff and students that are clearly linked to their identity or other personal information about them.
- Addresses.
- Financial information, such as bank details and tax status.
- Recruitment data.
- Attendance and behavioural information.
- Safeguarding information, including SEN assessments and data.
- School work and marks.
- Medical information, such as medical conditions
- Exam results.
- Staff development reviews.

4. RESPONSIBILITIES

4.1 The School Principal will act as the designated data protection officer and will be responsible for overseeing the implementation of this policy, monitoring the school's compliance with data protection law, and developing related policies and guidelines where applicable.

4.2 Heads of School act as a representative of the DPO and are responsible for the day to day management of data protection within the primary and secondary settings.

4.3 All staff are responsible for:

Collecting, storing and processing any personal data in accordance with this policy
Informing the school of any changes to their personal data, such as a change of address

Contacting the DPO in the following circumstances:

- With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure.
- If they have any concerns that this policy is not being followed.
- If they are unsure whether or not they have a lawful basis to use personal data in a particular way.
- If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data.
- If there has been a data breach.
- Whenever they are engaging in a new activity that may affect the privacy rights of individuals.
- If they need help with any contracts or sharing personal data with third parties.

5. COMPLIANCE

Any matters concerning the implementation of this Policy in any particular school should be raised with the Principal with a view to reaching a mutually workable solution. Any matters of non-compliance should be raised with the Head of Education.