PPS DATA PROTECTION POLICY

2026-2027

Phoenix Private School, Doha – For Staff

Effective Date: August 2026

Approved By: Principal & Governing Body

Next Review Date: August 2027

1. Mission, Vision, and Values

Mission:
To develop future leaders who are able to make positive changes throughout the world. We challenge today to create a better tomorrow.

Vision:
To prepare a generation of Successful Learners, Confident Individuals, Responsible Citizens and Effective Contributors.

Values:

- Perseverance
- Honesty
- Originality
- Enrichment
- Nurturing
- Inspiration
- eXcited to learn

2. Purpose

Phoenix Private School is committed to protecting the privacy and personal data of all members of its community, including students, parents, staff, governors, contractors, and visitors. This policy sets out how the school collects, uses, stores, shares, and protects personal data, ensuring it is handled lawfully, fairly, and securely.

3. Scope

This policy applies to:

- All personal data processed by Phoenix Private School
- All staff, governors, volunteers, contractors, and third parties who handle school data
- All formats of data, including paper records, electronic files, emails, images, and audio/video recordings

4. Definitions

- **Personal Data**: Any information relating to an identified or identifiable individual.
- **Sensitive/ Special Category Data**: Personal data requiring a higher level of protection (e.g. health, safeguarding, biometric data).
- **Data Subject**: The individual to whom the personal data relates.
- **Processing**: Any operation performed on personal data (e.g. collection, storage, use, sharing, and deletion).

5. Data Protection Principles

Phoenix Private School will ensure that personal data is:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary

4. Accurate and kept up to date
5. Kept only for as long as necessary
6. Processed securely to protect against unauthorised access, loss, or damage

6. Lawful Basis for Processing

The school will only process personal data where there is a lawful basis to do so, including:

- Compliance with legal or regulatory obligations
- Performance of a contract
- Protection of vital interests
- Public task / legitimate educational interests
- Consent (where required)

7. Types of Data Collected

Phoenix Private School may collect and process the following data:

- Student data: names, dates of birth, contact details, academic records, attendance, behaviour, medical and safeguarding information
- Parent/carer data: names, contact details, identification, payment information
- Staff data: employment records, qualifications, payroll, performance management
- Images and recordings: photographs and videos used for educational or promotional purposes

8. Data Collection and Use

Personal data will be collected directly from data subjects where possible and used only for:

- Educational provision and student support
- Safeguarding and wellbeing
- Staff recruitment, employment, and development
- Communication with parents and stakeholders
- Legal, regulatory, and inspection requirements

8. Data Storage and Security

The school will:

- Store data securely using password-protected systems and locked filing cabinets
- Restrict access to personal data to authorised staff only
- Use encryption and secure networks where appropriate
- Ensure staff receive regular data protection and safeguarding training

9. Data Sharing

Personal data may be shared with:

- Regulatory authorities and inspection bodies
- Examination boards and accreditation agencies
- Health and safeguarding professionals
- Service providers acting on behalf of the school

All third parties are required to comply with appropriate data protection and confidentiality standards.

10. International Data Transfers

Where personal data is transferred outside the country, Phoenix Private School will ensure appropriate safeguards are in place to protect the data.

11. Data Retention

Personal data will be retained only for as long as necessary in line with the school's retention schedule and legal requirements. Data will be securely disposed of when no longer required.

12. Rights of Data Subjects

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion of data (where applicable)
- Object to or restrict processing
- Withdraw consent (where processing is based on consent)

Requests should be made in writing to the school.

13. Data Breaches

Any actual or suspected data breach must be reported immediately to the Headteacher or designated Data Protection Lead. The school will investigate breaches promptly and take appropriate remedial action.

14. Responsibilities

- **Board of Directors/Governors**: Oversight of data protection compliance
- **Principal:** Overall responsibility for implementation
- **IT** : Day-to-day management and advice
- **Staff**: Compliance with this policy and data protection procedures

15. Monitoring and Review

This policy will be reviewed annually or sooner if there are changes in legislation or school operations.