



## Data Protection Policy (Information for Parents & Pupils)

Approved by: Board of Governors

Date of Approval: 01/09/2025

Next Review Date: 01/09/2026

Responsible: Head of IT/DSL/SLT

### 1. Purpose

1.1 English International School – Baghdad (EISB) is committed to protecting the privacy and confidentiality of all individuals whose personal data we process, including pupils, parents, staff, and other stakeholders.

1.2 This policy provides information about what data we collect, why and how it is used, and how we ensure its security. It also explains how individuals can exercise their rights under data protection legislation.

1.3 EISB complies with local Iraqi data protection requirements and aligns with the principles of GDPR where relevant.

1.4 The school ensures the protection of minors and their privacy in all activities and will regularly review and update this policy to reflect changes in law, technology, or school practice.

### 2. Scope

2.1 This policy applies to:

- Pupils and their parents/guardians
- School staff, interns, volunteers, and contractors
- Visitors and third parties who provide personal data to the school

2.2 EISB acts as the Data Controller for all personal data it processes.

2.3 Staff, parents, and pupils are encouraged to read this policy to understand their rights and responsibilities.

2.4 This policy complements other school policies, including safeguarding, confidentiality, CCTV, and ICT policies.



### 3. Terms & Definitions

- **Personal Data:** Any information that can identify an individual, e.g., name, address, photograph, or health information.
- **Minor:** Any pupil under the age of legal consent for data processing.
- **Data Subject:** The individual whose personal data is collected or processed.
- **Data Controller:** The school, responsible for determining how personal data is processed.
- **Data Processor:** Any external party processing data on behalf of the school.
- **Consent:** Freely given, informed permission to process personal data.
- **Data Processing:** Any operation on personal data, including collection, storage, or deletion.
- **Sensitive Data:** Data about health, religion, ethnicity, political views, or criminal records.
- **Data Protection Officer (DPO):** Oversees the school's compliance with data protection laws.
- **Parental Responsibility:** Legal rights and duties of parents concerning a child's education and welfare.

### 4. Data Protection Principles

EISB adheres to the following principles:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability
8. Consent where required

### 5. What Information Do We Collect?

- Pupil and parent contact information
- Staff and visitor records
- Educational, health, and welfare information
- Financial information for fees and payroll
- Records of communications and consents

### 6. How Do We Collect Your Personal Data?

- Directly from pupils, parents, and staff
- Paper and electronic forms, emails, and school websites
- Educational platforms and apps



- Photographs and CCTV recordings

## 7. Your Rights

### 7.1 Individuals have the right to:

- Access their personal data
- Rectify inaccuracies
- Request erasure (right to be forgotten)
- Restrict processing
- Data portability
- Object to processing
- Withdraw consent
- Complain to the Data Protection Officer or relevant authority

## 8. Why the School Processes Data

- To provide education, pastoral care, and school services
- To comply with legal obligations and safeguard pupils
- For recruitment, payroll, and staff administration
- For school administration, planning, and research
- For communication, marketing, and promotion with consent
- To ensure security and health & safety compliance

## 9. Types of Personal Data Processed

- Contact details, identification documents
- Health and welfare information
- Academic records and assessments
- Employment and background information for staff and parents
- Images and audio-visual materials

## 10. Images

- Images may be used for school publications, marketing, and social media with prior consent.
- Pupils and parents' consent is required for all publications.
- Parents may photograph their own children during authorised events; EISB is not responsible for third-party use.

## 11. Transfer of Information Between Schools

- Pupil records may be transferred to another school during enrolment.
- This ensures continuity of education and pastoral care.



## 12. Storing and Securing Information

- Technical and organisational measures ensure confidentiality, integrity, and security.
- Data is protected from unauthorised access, loss, or destruction.

## 13. Updating Your Information

- Parents and staff should update the school about changes to personal information through HR or Parent Engagement.

## 14. Sharing Your Information

- Only shared on a need-to-know basis or with consent
- Legal and safeguarding obligations may override consent
- Third-party service providers comply with data protection laws

## 15. Parental Responsibility

- Parents with shared custody receive equal access to information unless restricted by law
- Parents responsible for a child's education maintain rights to information even for pupils of legal age where applicable

## 16. Sending Commercial Communications

- Consent is required to receive newsletters or promotional materials
- Consent can be withdrawn at any time by contacting the school

## 17. Consent to Use Your Image

- Consent is required for photographs or videos used in publications
- Pupils of legal age can provide consent themselves
- Images are used only for educational or approved promotional purposes
- Unauthorised use by third parties is prohibited

## 18. Period of Retention

- Data is retained only as long as necessary and securely destroyed or anonymised thereafter

## 19. Data Accuracy and Security

- School ensures data is accurate and up to date
- Technical and organisational measures protect data security



- Staff are trained in data protection responsibilities

## 20. Cookies and Website Use

- Anonymous session cookies track usage for website efficiency
- No personal data is collected through cookies
- IP addresses may be logged for security and statistical purposes

## 21. Educational Applications

- School platforms and apps process sensitive pupil data for educational purposes only
- Access is password-protected and controlled
- The school retains the right to delete or manage pupil data at any time
- Compliance with international data protection standards is ensured

## Review

- This policy is reviewed annually to ensure compliance with current data protection legislation and best practices.