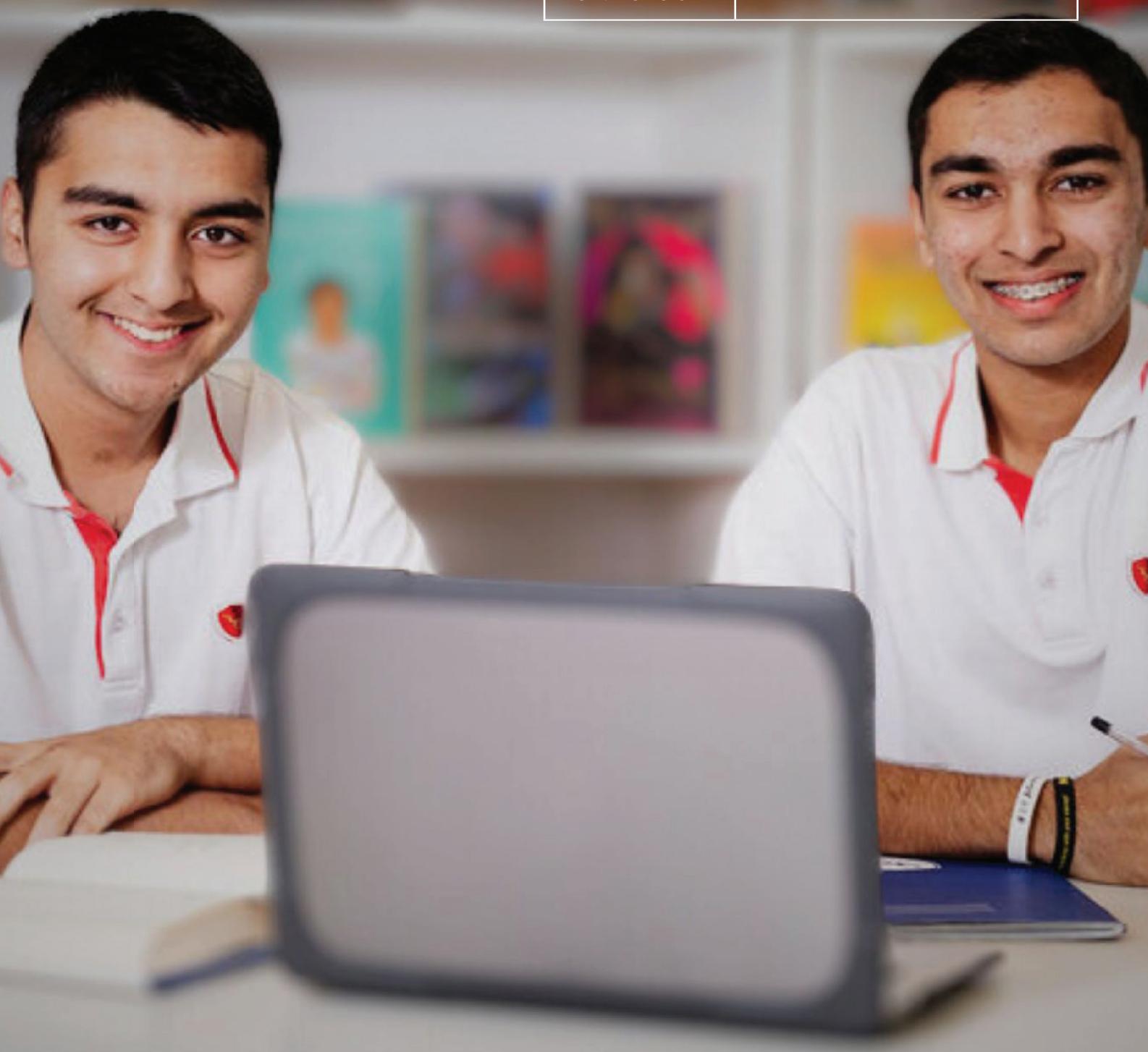




SWISS INTERNATIONAL SCHOOL
QATAR

DATA PROTECTION POLICY

Staff Incharge	School Life Officer
Latest revision	October 2024
Approved by	Head of School
Next Revision	October 2025





Our Vision

SISQ aims to develop learners who are
FULFILLED INSPIRED PREPARED

رؤيتنا

تهدف المدرسة السويسرية إلى تطوير متعلمين
يتصفون بأنهم

مُستَعِدون مُلَهَّمون مُشَبِّعون

Notre Vision

SISQ encourage les apprenants à devenir
ACCOMPLIS INSPIRÉS PRÊTS



Our Mission

Through learning that is fun, engaging, holistic, collaborative and caring, SISQ develops students who are:

- Intellectually fulfilled: they find joy in their own learning and the learning of others; they are curious, engaged and passionate about learning.
- Emotionally fulfilled: they are happy with themselves, healthy, balanced and confident.
- Socially fulfilled: they develop meaningful relationships; they are connected to others, the world around them and the environment.

Through learning that is inquiry-based, meaningful, challenging, authentic and innovative, SISQ develops students who are:

- Inspired to keep learning: they are inquisitive, questioning and willing to try new things; they take ownership of their learning and are self-motivated.
- Inspired to share and apply their learning: they can use their learning to improve their lives and the lives of others; they communicate their learning to inspire others.

Through learning that is focused on transferable skills, character, attitudes and dispositions, SISQ develops students who are:

- Prepared for the future: they embrace change and challenge; they adapt to new situations and think creatively to solve complex problems.
- Prepared to lead lives of integrity: they are principled and strong; they have a set of values that guide them when they make decisions.
- Prepared to be good global citizens: they are multilingual, open-minded and multicultural in their outlook; they are courageous, caring and prepared to take action to make their community and the world a better place.

رسالتنا

من خلال المعاشرة والمشاركة ، والتعاون ، والشمولية والاهتمام ، تعمل المدرسة

- السويسرية على تطوير طلاب يتصفون بأنهم مشاركون ذكيّون ، يجدون الفرح في تعلمهم وتعلم الآخرين : إنهم فضليون ، ويتقنون وتحظّون للتعلم.
- مشبعون بالطاقة إنهم سعداء بأنفسهم ، يتمتعون بصحة جيدة ، ومتوازنون ، وواقّعون اجتماعياً.
- مشبعون من أنفسهم : يطّورون لعلاقات ذات مقى : إنهم مرتبطون بالآخرين وبالعالم من حولهم وبالبيئة.

من خلال التعلم الاهداف والقائم على الاستقصاء ، والتحدي والإثمار ، تعمل

- المدرسة السويسرية على تطوير طلاب يتصفون بأنهم ذكيّون لمواصلة التعلم ، فهم فضليون ومتّسّلون ومستعدّون لتجربة
- أشياء جديدة : يتعلّمون بداعم ذاتيّة.
- ذكيّون لمشاركة ما تعلّموه وتطبّيقه ، يمكنهم استخدام ما تعلّموه لتحسين حياتهم وحياة الآخرين : ينقلون تعلّمهم إلى الآخرين.

من خلال التعلم الذي يركّز على المهارات القابلة للنقل والمهارات الشخصية والماورف والتصيرات تعلم المدرسة السويسرية على تطوير طلاب يتصفون بأنهم

- مستعدون للمستقبل يبنّون التغيير والتحدي : يتكفّلون مع المواقف الجديدة ويدركّون بشكل خالق حلّ المشكلات المعقّدة.
- مستعدون لعيش حياة تتسم بالنزاهة : أصحاب مبادئ أقواء : لديهم حماسة وشغف.
- مستعدون ليكونوا مواطنين عالميين صالحين : فهم متعددو اللغات ومتّسّلون ومتعددو الثقافات في ظاهرتهم : إنهم شعاعون ومهتمون.
- ومستعدون لاتخاذ إجراءات لجعل مجتمعهم والعالم مكاناً أفضل.

Notre Mission

Au travers d'expériences d'apprentissage amusantes, intéressantes, holistiques, collaboratives, positives, SISQ encourage les apprenants à devenir:

- Intellectuellement accomplis: ils prennent plaisir à apprendre individuellement et collectivement. Ils sont curieux, intéressés et passionnés par leur apprentissage.
- Emotionnellement aptes: ils savent s'apprécier, ils sont positifs, équilibrés et sûrs d'eux-mêmes.
- Socialement compétents: ils développent des relations significatives avec les autres, ils vivent en harmonie avec les autres, le monde et l'environnement.

Au travers d'un apprentissage centré sur la recherche, significatif, comportant des défis, authentique et innovant, SISQ encourage les apprenants à devenir:

- Toujours prêts à apprendre : ils sont curieux, ils posent des questions et sont prêts à innover, ils sont responsables de leur apprentissage et intrinsèquement motivés.
- Toujours prêts à partager et à appliquer leurs connaissances : capables d'utiliser leurs compétences pour transformer positivement leur existence et celle des autres, ils transforment leurs apprentissages pour inspirer autrui.

Grâce à un apprentissage orienté vers des compétences de transfert, l'édition du caractère, créant des attitudes et une disposition psychologique bénéfiques, SISQ encourage les étudiants à devenir:

- Prêts pour l'avenir : ils acceptent le changement et les défis, s'adaptent à de nouvelles situations et résolvent des questions complexes grâce à leur créativité.
- Déterminés à vivre de manière éthique, ils suivent leurs principes et sont intégrés. Leur valeurs les guident dans la prise de décisions.
- En tant que citoyens du monde: ils parlent plusieurs langues, pratiquent l'ouverture d'esprit en se confrontant à de multiples perspectives. Ils sont courageux, attentionnés et prêts à l'action pour transformer positivement leur communauté et le monde.



Our Commitment

Swiss International School, Qatar is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in compliance with Qatar Data Protection Law No. 13 of 2016.

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements. The legal basis for processing data is that it is necessary to carry out these tasks in the public interest.

The overall responsibility for data protection within SISQ is the Head of School. S/he has delegated the day-to-day responsibility of implementation to the Operations and Finance Manager. The departments whose members of staff deal with data protection daily are:

- Children and Family Data: Academic, Admissions, Marketing and School Life Departments
- Personal Electronic Data: IT Department
- Employee Personal Data: Human Resources Department

The school is also committed to ensuring that all staff are aware of data protection policies, legal requirements and adequate training is provided to them.

The requirements of this policy are mandatory for all staff employed by the school and any third party contracted to provide services within the school.

Personal and Sensitive Data

All data within the school's control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The Ministry of Transport and Communications defines personal and sensitive data as the "data of an individual whose identity is defined or can be reasonably defined whether through such Personal or through the combination of such data with any other data (...)".

Sensitive Personal Information might include but it is not limited to race or ethnic origin, political opinions, religious or philosophical beliefs, memberships in specific unions, physical or mental health condition, commission or alleged commission of any offence, etc.

The principles of the Data Protection Act shall be applied to all data processed:

- Ensure that data is fairly and lawfully processed
- Process data only for limited purposes
- Ensure that all data processed is adequate, relevant and not excessive
- Ensure that data processed is accurate
- Not keep data longer than is necessary
- Process the data in accordance with the data subject's rights
- Ensure that data is secure
- Ensure that data is not transferred to other countries without adequate protection



Fair Processing/Privacy Notice

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, parents and students prior to the processing of individual's data.

There may be circumstances where the school is required either by law or in the best interests of our students or staff to pass information onto external authorities, for example the Ministry of Education and Higher Education, the Ministry of Administrative Development, Labour and Social Affairs, the Ministry of Public Health, etc.

These authorities are up to date with data protection laws and have their own policies relating to the protection of any data that they receive or collect. The intention to share data relating to individuals to an organisation outside of our school shall be clearly defined within notifications and details of the basis for sharing given. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of an individual's data shall first be notified to them. Under no circumstances will the school disclose information or data:

- That would cause serious harm to a student or anyone else's physical or mental health or condition indicating that the student is or has been subject to child abuse or may be at risk of it, where the disclosure would not be in the best interests of the student
- Recorded by the student in an examination
- That would allow another person to be identified or identifies another person as the source, unless the person is an employee of the school or local authority or has given consent, or it is reasonable in the circumstances to disclose the information without consent. The exemption from disclosure does not apply if the information can be edited so that the person's name or identifying details are removed
- In the form of a reference given to another school or any other place of education and training, the student's potential employer, or any national body concerned with student admissions.

Data Security

In order to assure the protection of all data being processed and inform decisions on processing activities, SISQ shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Security of data shall be achieved through the implementation of proportionate physical and technical measures. Nominated staff shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data.



Data Access Requests (Subject Access Requests)

All individuals whose data is held by us, have a legal right to request access to such data or information about what is held. We shall respond to such requests within one month and they should be made in writing to the school: Head of School, Swiss International School, Qatar PO BOX 6256, Doha, Qatar, or delivered to the reception desk, or an email sent to info@sisq.qa with 'Data Access Request' in the subject line of the email.

No charge will be applied to process the request. Personal data about students will not be disclosed to third parties without the consent of the student's parent or carer, unless it is obliged by law or in the best interest of the student. Data may be disclosed to the following third parties without consent:

- Other schools - if a student transfers from Swiss International School, Qatar to another school, their academic records and other data that relates to their health and welfare will be forwarded onto the new school. This will support a smooth transition from one school to the next and ensure that the student is provided for as is necessary. It will aid continuation, which should ensure that there is minimal impact on the student's academic progress as a result of the move.

Examination authorities

This may be for registration purposes, to allow the students at our school to sit examinations set by external examination/assessment bodies.

Health authorities - as obliged under health legislation, the school may pass on information regarding the health of students in the school to monitor and avoid the spread of contagious diseases in the interest of public health.

Police and courts - if a situation arises where a criminal investigation is being carried out, we may have to forward information on to the police to aid their investigation. We will pass information onto courts as and when it is ordered.

Social workers and support agencies - in order to protect or maintain the welfare of our students, and in cases of child abuse, it may be necessary to pass personal data on to social workers or support agencies. Educational division - school may be required to pass data on in order to help the government to monitor the national educational system and enforce laws relating to education.

Right to be Forgotten - where any personal data is no longer required for its original purpose, an individual can request that the processing is stopped and all their personal data is erased by the school including any data held by contracted processors.

Photographs and Video

Images of staff and students may be captured at appropriate times and as part of educational activities for use in school only. Unless prior consent from parents/students/staff has been given, the school shall not utilise such images for publication or communication to external sources. It is the school's policy that external parties (including parents) may not capture images of staff or students during such activities without prior consent.



The school will ensure that the consent is freely given, specific, informed and unambiguous, and that the consent is recorded.

Location of Information and Data

Hard copy data, records, and personal information are stored out of sight and in a locked cupboard. The only exception to this is medical information that may require immediate access during the school day. This will be stored with the school medical coordinator. Sensitive or personal information and data should not be removed from the school site, however the school acknowledges that some staff may need to transport data between the school and their home in order to access it for work in the evenings and at weekends. This may also apply in cases where staff have offsite meetings, or are on school visits with students.

The following guidelines are in place for staff in order to reduce the risk of personal data being compromised:

- Paper copies of data or personal information should not be taken off the school site. If these are misplaced, they are easily accessed. If there is no way to avoid taking a paper copy of data off the school site, the information should not be on view in public places, or left unattended under any circumstances. Unwanted paper copies of data, sensitive information or student files should be shredded. This also applies to handwritten notes if the notes reference any other staff member or student by name.
- Care must be taken to ensure that printouts of any personal or sensitive information are not left in printer trays or photocopiers.
- If information is being viewed on a PC, staff must ensure that the window and documents are properly shut down before leaving the computer unattended. Sensitive information should not be viewed on public computers.
- If it is necessary to transport data away from the school, it should be downloaded onto a USB stick. The data should not be transferred from this stick onto any home or public computers. Work should be edited from the USB, and saved onto the USB only.
- USB sticks that staff use must be password protected. These guidelines are clearly communicated to all school staff, and any person who is found to be intentionally breaching this conduct will be disciplined in line with the seriousness of their misconduct.

Data Protection Policy Data Breach

All employees, contractors, agents and representatives, volunteers and temporary staff must immediately report a security incident or data breach to the Operations and Finance Manager. The school will assess the known facts and qualify the data breach (accident or unlawful) in order to take all measures to contain and minimise the impact of the breach. Also based on the assessment and the severity of the situation the school will review procedures and implement them in order to avoid repetition and protect the individual rights.



Data Disposal

The school recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk. All data held in any form of media (paper, tape, electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services. All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Requesting Access to Your Personal Data

Under data protection legislation, parents and students have the right to request access to information about them that SISQ holds. To make a request for your personal information, or be given access to your child's educational record, send a request to the Head of School at info@sisq.qa.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed and claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern by emailing us to info@sisq.qa.

Bibliography

1. Ministry of Transport and Communications. "Law No.13 of 2016 Personal Data Privacy Protection." compliance.qcert.org, 2016, <https://compliance.qcert.org/sites/default/files/library/2020-11/Law%20No.%20%2813%29%20of%202016%20on%20Protecting%20Personal%20Data%20Privacy%20-%20English.pdf>. Accessed Sunday March 27th 2022.