

AL RAYADA INTERNATIONAL SCHOOL

Centre Number: 96832

PRIVACY POLICY

Version	1.0
Date Issued	June 2026
Next Review	June 2027
Policy Owner	Head of Centre – Al Rayada International School

1. Introduction

Al Rayada International School (“the School”, “we”, “us”, “our”), Centre Number 96832, is committed to protecting the privacy and personal data of all individuals associated with the School, including students, parents, carers, staff, governors, and other stakeholders.

This Privacy Policy explains how we collect, use, store, share, and protect personal data in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR) and relevant national data protection law. It applies to all personal data processed by the School, whether held electronically or in paper form.

We are committed to being transparent about how we handle personal data and to upholding the rights of individuals. By engaging with our School, you acknowledge that your personal data may be processed in accordance with this policy.

2. Who We Are (Data Controller)

Al Rayada International School is the Data Controller for personal data processed in connection with its educational activities. As Data Controller, we determine the purposes and means of processing personal data.

School Name	Al Rayada International School
Centre Number	96832
Data Protection Contact	Abdalrahmun Turki – IT Officer
Contact Email	it@ris.sch.ly

3. Personal Data We Collect

We collect and process personal data across several categories of individuals. The type of data collected varies depending on the individual's relationship with the School.

3.1 Students

- Full name, date of birth, gender, and nationality.
- Contact details and home address.
- Academic records, assessment results, and examination entries.
- Attendance and behaviour records.
- Special educational needs (SEN) and medical/health information (special category data).
- Photographs and, where applicable, CCTV footage.
- Candidate numbers and examination registration data shared with awarding organisations.

3.2 Parents and Carers

- Full name and contact details (telephone, email, address).
- Relationship to the student.
- Financial information where relevant to fee payments or bursary applications.
- Communications and correspondence with the School.

3.3 Staff

- Full name, contact details, date of birth, and national identity information.
- Employment records, qualifications, and references.
- Payroll, pension, and banking details.
- DBS / background check records and safeguarding information.
- Performance reviews and disciplinary records.
- Training records, including cyber security and safeguarding training completion.

3.4 Governors and Volunteers

- Name, contact details, and role.
- DBS check information where applicable.
- Meeting attendance and governance records.

4. How We Use Personal Data

We use personal data only for legitimate purposes directly related to the operation of the School. Our primary purposes include:

Purpose	Data Used	Legal Basis
Delivering education and managing student progress	Student academic and attendance records	Legitimate interest / Legal obligation
Examination registration and results reporting to awarding organisations (e.g. Cambridge, Pearson)	Candidate details, centre number, results	Legal obligation / Contract
Safeguarding and child protection	Student and staff data as required	Legal obligation / Vital interest
Managing staff employment and payroll	Staff HR and payroll records	Contract / Legal obligation
Communicating with parents and carers	Contact details, student records	Legitimate interest / Consent
School security (CCTV, access control)	Images, access logs	Legitimate interest / Legal obligation
Meeting legal and regulatory obligations	As required by applicable law	Legal obligation

5. Special Category and Sensitive Data

Certain categories of personal data require a higher level of protection. We may process the following special category data where there is a clear legal basis to do so:

- Health and medical information (e.g. allergies, conditions affecting learning or examinations).
- Special Educational Needs (SEN) and disability information.
- Safeguarding records, including information relating to child protection concerns.
- Biometric data where used for identification purposes (e.g. access control systems).
- Racial or ethnic origin, where required for equalities monitoring.

Special category data is processed only where strictly necessary and in accordance with the applicable legal basis. Access is restricted to authorised personnel on a need-to-know basis.

6. Sharing Personal Data

We do not sell personal data. We share data only where necessary and with appropriate safeguards in place. Recipients may include:

- Awarding organisations (e.g. Cambridge Assessment International Education, Pearson/Edexcel) for examination registration, conduct, and results.
- Government authorities and regulatory bodies as required by law.
- Educational support services, including learning platforms, library systems, and school management information systems (MIS).
- Medical professionals or emergency services where there is a safeguarding or health emergency.
- External auditors and inspection bodies.

- IT service providers and cloud platform operators – subject to Data Processing Agreements ensuring appropriate data protection standards.

Where data is shared with third parties acting as Data Processors, we ensure that appropriate contractual arrangements are in place to protect personal data in accordance with applicable law.

7. International Data Transfers

As an international school, some personal data may be transferred to or accessed from countries outside the jurisdiction in which the school operates. Where such transfers occur, we ensure that appropriate safeguards are in place, which may include:

- Adequacy decisions recognising the destination country's data protection standards.
- Standard Contractual Clauses (SCCs) or equivalent approved mechanisms.
- Binding Corporate Rules where applicable.

Personal data submitted to awarding organisations based in the UK or other jurisdictions is subject to those organisations' own privacy policies, which we encourage individuals to review.

8. How Long We Keep Data

We retain personal data only for as long as necessary for the purpose for which it was collected, or as required by applicable law or regulatory guidance. Our key retention periods include:

Type of Data	Retention Period
Student academic and examination records	Minimum 7 years after the student leaves the School
Safeguarding and child protection records	Until the individual turns 25, or as directed by applicable regulations
Staff employment records	7 years after employment ends
CCTV footage	30 days (unless retained for an ongoing investigation)
Financial and payroll records	7 years
Training records (including cyber security)	Duration of employment plus 3 years

At the end of the applicable retention period, data is securely disposed of or anonymised.

9. How We Protect Personal Data

We take the security of personal data seriously. Our technical and organisational measures include:

- Secure IT systems protected by firewalls, anti-malware software, and access controls.
- Encryption of sensitive data, particularly on portable devices and in cloud storage.
- Multi-factor authentication for access to key systems.
- Regular software updates and security patching.
- Role-based access control: staff access only the data they need to perform their duties.
- Annual cyber security training for all staff with access to examination or personal data systems.
- Secure data backup and tested recovery procedures.
- Physical security measures including locked storage for paper-based personal data.

Despite these measures, no data transmission or storage system is entirely secure. In the event of a data breach, we will take prompt action to contain the incident and notify affected individuals and relevant authorities in accordance with our legal obligations.

10. Your Rights

Individuals whose personal data we process have the following rights, subject to applicable legal conditions:

Right	What It Means
Right of Access	You may request a copy of the personal data we hold about you (Subject Access Request).
Right to Rectification	You may ask us to correct inaccurate or incomplete personal data.
Right to Erasure	In certain circumstances, you may ask us to delete your personal data.
Right to Restrict Processing	You may ask us to limit how we use your data in certain circumstances.
Right to Data Portability	Where processing is based on consent or contract, you may request your data in a machine-readable format.
Right to Object	You may object to processing based on legitimate interests or for direct marketing purposes.
Rights re: Automated Decisions	You have the right not to be subject to solely automated decisions with significant effects.

To exercise any of these rights, please contact the Data Protection Officer using the details in Section 2 of this policy. We will respond within the timeframe required by applicable law (typically one month). We may need to verify your identity before processing your request.

11. Website and Digital Services

Where the School operates a website or digital learning platforms, we may collect limited technical data such as IP addresses, browser type, and usage analytics. This data is used solely to improve our digital services and is not used to identify individuals without further information.

Where cookies or similar technologies are used, users will be informed and given the opportunity to manage their preferences in accordance with applicable requirements.

12. Concerns and Complaints

If you have any concern about how we handle your personal data, please contact us in the first instance using the details provided in Section 2. We take all concerns seriously and will investigate and respond promptly.

If you are not satisfied with our response, you have the right to lodge a complaint with the relevant data protection supervisory authority in your jurisdiction.

13. Policy Review

This Privacy Policy is reviewed annually by the Senior Leadership Team and updated as necessary to reflect changes in legislation, school practice, or data processing activities. Material changes will be communicated to relevant individuals.

Version	Date of Review	Reviewed By	Next Review Due	Approved By
1.0	June 2026	Head of Centre / DPO	June 2027	Head of Centre / Governors Chair

Signed: _____

Head of Centre – Al Rayada International School

Signed: _____

Chair of Governors – Al Rayada International School