

AAPS Staff Fair Processing Notice / Privacy Notice

The School needs to collect and process staff personal data in order to function effectively as an organization. Personal data is processed for a variety of reasons (as set out below) and all such personal data will be collected and processed in accordance with the requirements MOE, MOL & School management.

This notice explains how the school collects, uses, and shares personal data relating to prospective, current, and former employees, workers, and consultants (you/your) and your rights in relation to the processing of your personal data.

In this notice:

personal data means any data which can identify you directly or indirectly (whether itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).

processing means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

The school is a 'controller' in relation to your personal data.

Changes to this notice

The School may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes, however where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Staff Data Protection Officer by email at hr.aaps@ajmanamericanschool.com or by phone on ext. 1037.

How we collect your personal data

Most of the personal data set out in this notice will have been provided by or observed about you in the course of the application and recruitment process or during the course of your working relationship with the School.

The School may sometimes collect personal data about you from third parties including:

your CV from any recruitment agencies that were authorized by you to approach the School regarding a position

references from former employers, colleagues or other relevant parties

information collected as a result of formal background checks.

information requested from external sources to assist in the consideration of promotion to academic posts

other relevant information in the public domain

Types of personal data processed

Depending on your role, this notice sets out the types of personal data that the School may collect and process about you, including “special categories of personal data” which are particularly sensitive and require us to take additional steps to ensure their security and confidentiality.

Personal data provided by you about others

You may provide us with personal data about other individuals, for example, next of kin/emergency contact details and information about your family circumstances and dependents. You should notify the relevant person that you are providing their contact details to the School as your listed next of kin/emergency contact.

How the School uses personal data about you

Depending on your role, the School may process personal data (including special categories of personal data) about you for the following purposes:

- The administration of prospective, current, and past employees including employed, contract personnel.
- The recruitment and selection process

- Administration of non-School staff contracted to provide services on behalf of the School
- The administration of payroll services
- Planning and management of the School's workload or business activity
- Occupational health service / Insurance
- administration of agents or other intermediaries
- pensions administration
- disciplinary matters, staff disputes, employment tribunals
- staff training and development
- ensuring staff are appropriately supported in their roles
- vetting checks
- assessing the School's performance against equality objectives as set out by the Equality Act 2010
- Lawful grounds for processing your personal data

We will only use your personal data when we are permitted to do so by law. Most commonly, we will use your personal data:

to perform a contract the School has entered into with you or take steps before entering into a contract with you at your request (for example, your employment contract)

to comply with the School's legal obligations (for example, complying with employment, health and safety and safeguarding laws, preventing and detecting crime, assisting the police and other authorities with their investigations)

where necessary for our legitimate interests or those of a third party provided your interests and rights do not override those interests (for example, evaluating the suitability of a candidate for a role or defending employment claims brought by you)

to protect your vital interests or those of another person (for example, where we know or have reason to believe that you or another person may suffer harm)

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your consent. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your explicit consent unless a condition applies which allows us to process such personal data without doing so.

Sharing your personal data with third parties

Where the School has lawful grounds for doing so, the School may share your personal data with the following third parties:

- Ministry of Education (MOE)
- Educators and examining bodies
- Our external regulators
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations & Insurance providers
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Professional bodies

Insurance providers

Where the School uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to such persons unless you have given your consent or the disclosure is otherwise made in accordance with data protection law.

Please note that we may need to share your personal information with a regulator or to otherwise comply with the law, and the list above is not necessarily exhaustive.

Where your personal data are stored

Some of your personal data may be held in hard copy files stored in secure locations. Most personal data about you, including your personnel file, will be stored on servers within the UAE. The School will only transfer your personal data outside the UAE.

How the School keeps your personal data secure

The School has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the School limits access to your personal data to the persons and organisations, including those described above, who have a lawful and legitimate need to access it. For further information, visit the School's Information Security page.

The School has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

How long the School will retain your personal data

The School must only to retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Generally speaking, all relevant correspondence in relation to your employment or engagement will be held by Human Resources and retained for six years after you have left the School or your engagement has ceased, after which time it will be securely disposed of. Basic information about your employment or engagement (appointment, dates of service etc) will be retained indefinitely.

In some cases, the School may anonymise your personal data so that it can no longer be identified with you, in which case the School may retain such data indefinitely.

If notice of a claim or Pre-Action or Early Conciliation correspondence is received, then we may retain and process relevant personal data to defend the claim for the duration of the proceedings. Whilst we may dispose of any personal data after the conclusion of the claim, please be aware that all litigation documents disclosed or evidence given may be a matter of public record.

Contact directory

Employees' (and sometimes independent consultants and contractors') contact details will be publicly available via the School Contact Directory. This will include name, job title, work address, email address and telephone number. This information is classified as 'public' in the School's data classification scheme. Some further information, such as CVs, photos and research interests, may also be made available on departmental/school websites.

The information is made available on the basis of the School's legitimate interest in ensuring that colleagues, students and, where applicable, members of the public, can contact our staff and to promote the School's work.

Where there is good reason, members of staff may apply to the School HR to have their contact details removed from public view. This may be a temporary or permanent change depending on the circumstances. If you wish to make such an application, please email:

hr.aaps@ajmanamericanschool.com

The School will not release a blanket list of staff email addresses into the public domain to prevent a rise in spam emails received by staff.

Email

Email for staff is provided by a School. This requires the School to disclose some personal data (name and email address) to this third party, who will also have access to the contents of email and calendar accounts.

Staff using the service are also subject to the third party's terms of use and privacy policy and are notified of these terms when issued with their account.

Staff email addresses are issued and used for communicating about School business. You may give further consent for your email address to be used for other purposes during your time here, e.g. joining a specific mailing list.

Your responsibilities

You must ensure that any personal data collected and processed by you in the course of performing your duties and obligations is held in accordance with the School's Data Protection Policy. Any research involving the use of personal data should only be conducted following an ethical review. You are also subject to the School's Information Security Policy.

Members of staff are able to notify the School of any changes to their contact details via Orison. It is important the School has an accurate record of staff details in case there is a need to make contact with staff in emergency circumstances.

CCTV

The School operates CCTV around its properties for security and crime detection purposes. For further information, please see the School's CCTV Code of Practice.

Your rights

You have a number of rights in relation to the processing of your personal data by the School:

Access: You have the right to request access to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the School is processing it lawfully and fairly.

Correction: You have the right to request correction of any inaccurate or incomplete personal data held about you.

Deletion: You have the right to request erasure of any personal data held about you where there is no good reason for the School to continue processing it or where you have exercised your right to object to the processing of your personal data.

Restriction: You have the right to request restriction of how the School processes your personal data; for example, to confirm its accuracy or the School's reasons for holding it or as an alternative to its erasure.

Objection: You have the right to object to the School's processing of any personal data which is based on the legitimate interests of the School or those of a third party based on your particular circumstances. You also have the right to object to the School processing your personal data for direct marketing purposes.

Portability: You have the right to receive or request that the School transfers a copy of your personal data in an electronic format where the basis of the School processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.

To exercise any of these rights you must contact the School's Staff Data Protection Officer at data-hr.aaps@ajmanamericanschool.com. The school may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the School to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, the School may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the School may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the School may ask you to verify your identity before fulfilling any request in relation to your personal data.