



Data Protection Policy

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Introduction

Shrewsbury International School India (the "School") is dedicated to ensuring the privacy and security of personal data in line with applicable data protection laws and regulations. This policy outlines our commitment to protecting personal data, including the rights of data subjects, as required under Indian law, specifically the **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011** and the **Digital Personal Data Protection Act (DPDPA) 2023**

This policy applies to all personal data processed by the School, including that of students, staff, parents, and other individuals associated with the School. The School will ensure that data processing activities are lawful, transparent, and respect the rights of individuals.

Appointment of Data Protection Officer (DPO)

The School will appoint a Data Protection Officer (DPO) who will oversee compliance with this policy and the relevant data protection laws. The DPO will:

- Ensure that the School's data processing activities comply with the applicable data protection regulations.
- Provide advice and guidance on data protection issues and ensure staff are trained in data protection.
- Act as a point of contact for individuals who wish to exercise their data protection rights.
- Ensure that data protection impact assessments are conducted where necessary.
- Report any data protection concerns directly to the Headmaster and the School's governing body.

The contact details of the DPO will be communicated to all stakeholders.

Purposes for Processing Personal Data

The School will process personal data for the following purposes:

- To provide education, including student enrolment, academic performance, attendance, and school activities.
- To ensure the safety and well-being of students and staff.
- To meet legal, regulatory, and contractual obligations, including compliance with educational authorities.
- To manage payroll, employment records, and staff performance.
- To communicate with parents, guardians, and students about school activities, progress, and welfare.
- To manage financial transactions, including fees and payments.
- To send newsletters, updates, and promotional materials (with consent when required).
- To conduct research, surveys, or feedback related to school services and performance.
- To address any legal claims or disputes.

Personal data will only be processed for these purposes, unless otherwise required by law or with the consent of the data subject.

Data Protection Considerations with Suppliers, Consultants, and Partners

When engaging with third-party suppliers, consultants, and partners who may handle personal data on behalf of the School, the following considerations will be ensured:

- **Data Processing Agreement (DPA):** The School will ensure that contracts or agreements with third parties include provisions that ensure they handle personal data in compliance with data protection laws.
- **Due Diligence:** Prior to engaging third parties, the School will conduct due diligence to ensure that they implement appropriate data protection safeguards.
- **Data Minimization:** Third parties will only process personal data that is necessary to provide the agreed services.
- **Security Measures:** The School will ensure that third parties implement reasonable security practices and procedures to protect personal data.

Subject Access Requests and Other Rights Requests

The School acknowledges the rights of individuals under the applicable data protection laws and commits to facilitating these rights. These include the right to access, correct, delete, or restrict the processing of their personal data.

- **Subject Access Requests (SARs):** Any individual who wishes to access their personal data should submit a written request to the Data Protection Officer (DPO). The School will respond within 30 days or the time frame set by applicable laws.
- **Correction and Deletion:** Individuals may request the correction or deletion of inaccurate or unnecessary data. The School will evaluate the request and make appropriate changes where necessary.
- **Objection to Processing:** If an individual objects to the processing of their data, the School will assess the objection and ensure that processing is stopped unless there are overriding legitimate grounds.
- **Restriction of Processing:** Individuals may request a restriction on the processing of their data. The School will consider such requests and take appropriate action based on the legal basis of the request.

Routine Disclosures and Uses of Personal Data

The School may disclose personal data to the following parties in compliance with applicable laws:

- **Legal and Regulatory Bodies:** Personal data may be shared with government agencies or educational authorities as required for compliance with laws and regulations (e.g., Ministry of Education, CBSE).
- **Law Enforcement:** In cases of suspected fraud, misconduct, or other legal obligations, personal data may be disclosed to law enforcement authorities.

- **Third-Party Providers:** The School may share personal data with third-party service providers or contractors for administrative purposes (e.g., catering services, health services).
- **Parents and Guardians:** Information related to students' academic performance, health, and attendance may be shared with parents or guardians as necessary.
- **Consent-Based Disclosures:** The School will seek consent before disclosing personal data for purposes other than those required by law or as necessary for the provision of services.

The School will ensure that all disclosures are consistent with the applicable data protection laws and that data subjects are informed of how their personal data is being used.

Retention of Records, Disposal of Data, and Data Accuracy

- **Data Retention:** Personal data will be retained for no longer than is necessary for the purposes for which it was collected. The retention period for different categories of data will be established in line with legal requirements and operational needs. This applies to the data held for students and staff.
- **Data Disposal:** Once personal data is no longer required, it will be securely disposed of to prevent unauthorised access or misuse. This includes physical destruction of paper records and secure deletion of electronic data.
- **Data Accuracy:** The School will take reasonable steps to ensure that personal data is accurate and up to date. Individuals are encouraged to notify the School of any changes to their personal information to ensure it remains accurate. The School makes clear that the burden of responsibility for accuracy of information held lies with the data subject e.g. it makes clear to parents that they must update the School about any changes to their child's personal data and asks the same of staff.

Data Breach Management

The School will take appropriate steps to prevent, identify, and manage any data breaches.

- **Immediate Reporting:** In the event of a data breach, staff members must immediately report the breach to the Data Protection Officer (DPO) and the Headmaster.
- **Containment and Assessment:** The DPO will assess the breach, contain it, and take steps to mitigate the risk of harm to individuals affected by the breach.
- **Notification:** If the breach poses a risk to the rights and freedoms of individuals, the School will notify the affected individuals without undue delay. In cases where the breach is significant, the breach will also be reported to the relevant authorities (e.g., the **Indian Computer Emergency Response Team** or any data protection regulator once established).
- **Corrective Action:** Following a data breach, the School will evaluate its data protection measures and implement corrective actions to prevent a recurrence.

Enforcement

All employees, contractors, and other stakeholders of the School are expected to comply with this Data Protection Policy. If an individual believes that the School has not complied with this policy or has mishandled their personal data, they should:

- Contact the Data Protection Officer (DPO) or the designated person in the School.
- Provide details of the issue or concern in writing, outlining the specific instance of non-compliance.
- The DPO will investigate the concern and respond within a reasonable time frame.

If the individual is dissatisfied with the response, they may escalate the issue to the Headmaster or School's Grievance Policy Staff) or Complaints Procedure (Parents). If the individual remains unsatisfied, they may lodge a formal complaint with the relevant regulatory authorities (e.g., the **Indian Computer Emergency Response Team** or any data protection regulator once established) or other applicable government bodies.

Conclusion

The School is committed to protecting the personal data of all its stakeholders. This policy will be reviewed and updated regularly to ensure that it remains in compliance with evolving laws and best practices. All members of the School community are expected to adhere to this policy to ensure the security and privacy of personal data.

This Data Protection Policy must be read in conjunction with any other privacy or data protection-related documents issued by the School.