UWC Dilijan Data Use and Protection Policy

Policy Statement

UWC Dilijan is committed to proper use and protection of data. All use shall be done in accordance with the laws of the Republic of Armenia. As a member of an international network of schools, UWC National Committees UWC Dilijan will strive to the extent possible to preserve GDPR guidance as best available practice.

Purpose

This Policy sets up the rules and expectations in respect of proper data use and protection.

Scope

1. This Policy is made available and mandatory for application by all members of staff. If a staff member's family member becomes aware of data covered under this Policy (e.g. either because the family leaves on campus or otherwise), it is the staff member's responsibility to ensure that his/her family members are aware of and comply with the rules set forth here.
2. This Policy is made available and mandatory for application by all learners.
3. This Policy is made available and mandatory for all those, who even if formally have no connection to the College, but within the scope of their professional responsibilities come across College related data (e.g. RVVZ sister organizations' fundraising, financial teams) via using CRM or other data management systems. These parties cannot send out any official communication on behalf of the College, unless that communication is formally approved by the College's Communications' team. If those parties do not comply with this Policy, the College reserves the right to refuse their access to College data.
4. For the purposes of this Policy the terms defined below have the following meaning:

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"data" means:

- **Personal data**: any information relating to an individual, which allows or may allow for direct or indirect identification of a person's identity;
- **Professional data**: any information relating to the activities of the school, irrespective of the fact whether such data is specifically identified as confidential or as a trade (professional) secret.

"**use**" means:

an operation performed upon data, which may be directly or indirectly aimed at delivering decisions or forming opinions or acquiring rights or granting rights or privileges or restricting or depriving of rights or achieving other purpose, which give rise or may give rise to legal consequences for the data subject or third parties or otherwise relate to the rights and freedoms thereof.

"**operating/operation of data**" means:

any operation or set of operations, irrespective of the form and mode of implementation (including automated, with or without use of any technical means) thereof, which is related to the collection either stipulation or input or systematisation or organisation or storage or use or alteration or restoration or transfer or rectification or blocking or destruction of data or to carrying out other operations.

Procedure

5. General Principles of Data Use and Protection

- *Lawfulness*

The processor of data shall follow and ensure that the data is processed in accordance with the requirements of the law. Data shall be processed for legitimate and specified purposes and may not be used for purposes, other than the professional responsibilities for a staff member or the learning process – for a learner.

If you are uncertain about the lawfulness of use of specific data, please address your concern to the Legal Department (legal@uwcdilijan.am).

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- *Proportionality*

Data use and operation must pursue a legitimate purpose, measures to achieve it must be suitable, necessary and moderate. The process should aim to process as less data as possible to achieve the legitimate purposes. Use and operation of data that is not necessary for the purpose or are incompatible with it shall be prohibited. As far as possible, operators of data shall aim to achieve the defined purpose by using and operating depersonalized data. Data must be stored in such a way as to exclude the identification thereof with the data subject for a period longer than is necessary for achieving predetermined purposes.

The school aims to provide best possible care for the learners. Therefore, by preserving the proportionality principle, the school also needs to make sure that communication is maintained to a level sufficient to ensure that all concerns are duly raised and taken into account of.

❖ How does the proportionality principle apply to use of data by students?

If you want to share a concern about yourself or another student **to a trusted adult**, please share it to the fullest of your knowledge. It will be the adult's responsibility to preserve the proportionality principle, when further working with the information that you have shared and guiding you regarding further steps.

In all other cases, please always be respectful of others' personal life.

❖ How does the proportionality principle apply to use of data by staff members?

Staff members shall use their professional judgment to identify the scope of other staff members, who need to know that data. In all cases, the best interest of the student shall be considered.

In case of doubt,
If the matter relates to student well-fare and safeguarding, please refer to the DSL,
If the matter relates to staff well-being or health (including staff members' families), please refer to HR or the Senior Doctor,

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If the matter relates to the school's partners, stakeholders, donors, state agencies, etc., please refer to Head of Communications,
For all other matters, please refer to legal.

- *Reliability*

All used and operated data must be complete, accurate, simple and, where necessary, kept up to date.

- *Non-discrimination*

The use of data to discriminate against a community member is forbidden and will be considered a serious breach of professional conduct for staff members, and of Student Code of Conduct for students.

6. Protected Data

These are the categories of data considered protected. This means that sharing of this data must be done strictly in accordance with the principles stated above and, on a need-to-know basis.

- Health (Physical and Mental) and Private Life

All information that relates to a person's health and private life is protected and cannot be shared, unless there are special circumstances justifying it.

At the same time, the school strives to ensure the well-being of all community members and to safeguard the students.

Therefore,

If

- you have concerns about a student's health or a matter relating to their private life,
- and that concern is important enough that in your opinion it could put the student or other community members in danger,
  please proceed in accordance with the residential life and safeguarding guidelines,

If

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- you have concerns about another community member's health or a matter relating to their private life,
- and that concern is important enough that in your opinion it could put students, that community member or other community members in danger,

  please communicate to HR or the Head of College.

There might be cases where to protect the community it will be required to share information about an individual's health or private life. This will be done only by the Head of College with protecting as far as possible that individual's privacy and dignity.

- Financial Data

All financial data is considered protected.

That means,

for staff members –

We ask you to keep confidential your salary amount, as well as financial data related to the school's relations with third parties (such as contract prices, amounts of donations made to the school, unless that information is lawfully made publicly available - information on donors' identities etc.).

All staff members, who need to have access to others' financial data in order to perform their professional responsibilities, need to keep that data strictly confidential.

for students –

We ask you to keep confidential the amount of scholarship/ bursary/ financial support you received from the school. This information is lawfully available to your parents, when applicable – your National Committee, and when applicable – the individual sponsor, who funds your studies at the school.

- All other data, that is normally not publicly shared, is considered protected.

7. Data Storage

All data must be stored on school official platforms only.

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No individual/ local copies of data shall be created.

All use, operation and sharing of data shall be done only through school official platforms and official communication channels.

8. If you come across any data that is supposed to be protected and you consider that you do not need to know that data, please refer the case to the Head of College, so that appropriate measures to protect the data be taken.

9. Proper Use of Devices

The school ensures safety measures to properly protect and safeguard data. This means that from time to time you will be asked to do updates on the devices through which you have access to school data and the school can monitor usage.

All devices through which you have access to school data must be password protected. Never share the passwords to devices through which you have access to school data.

Never leave the devices through which you have access to school data unattained in a way that can allow anyone (including other community members) to gain authorized access to data.

If you lose or misplace any device through which you gain access to school data or you fear unauthorized access to data might have happened, please report to the IT department immediately.

10. Use of Personal Accounts

Staff members shall not share student images (including videos, recordings) or student data though their personal accounts (even if consent of the student has been received). It is however allowed to re-share images and data that have been shared through official College accounts.

Staff members can however share on their personal accounts group images of students, provided that such an image does not allow to identify any student individually.

11. Video Surveillance

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All community members are aware that for security reasons, video surveillance is done on the campus. Cameras are installed only towards areas accessible for public use. No cameras are installed in toilets, bathrooms, changing rooms, classrooms or residential rooms.

The video surveillance footage is accessible to the security company hired by the school and stored on a local electronic storage. Unless there are valid grounds to keep the footages longer, normally all footages are destroyed after 30 days.

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