School Records Management Policy

Approved by: Governing Board	Date: October 2025
Last reviewed on:	Date: August 2026
Next review due by	August 2027

This policy is developed in accordance with ADEK's Records Policy. This policy outlines the principles and procedures for managing school records to ensure compliance with applicable laws and ADEK policies, safeguard personal data, and support operational efficiency.

Monitoring and review
This policy is subject to continuous monitoring, refinement, and audit by the School Management, who will undertake a complete annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged.

1. Purpose

This policy outlines the principles and procedures for managing school records to ensure compliance with applicable laws and ADEK policies, safeguard personal data, and support operational efficiency.

2. Types of Records Maintained

The School maintain the following records:

- **Student Records**: These include but are not limited to personal info, attendance, academic progress, extracurriculars, behavioral incidents, DLPs, reports to ADEK and stakeholders.
- **Medical Records**: These records include all medical related information or documents provided by parents or collected by the school in accordance with applicable laws and procedures. These records are solely accessible to the school Medical Team and the School Director and may be shared with relevant school employees when needed.
- **Staff Records**: Personal, employment, educational, professional conduct, and reports to ADEK.
- **Financial Records**: The financial records include various financial and accounting records.
- **Administrative Records**: Facilities, HR, finance, IT, committees, inspections, legal contracts.
- **Governance Records**: Policies, board minutes, elections, development plans, annual reports.

3. Rationale for Data Collection and Storage

The school collects and stores records to fulfill educational, operational, legal, and regulatory responsibilities. Each category of records serves a distinct purpose, contributing to the overall safety, efficiency, and accountability of the school.

3.1 Student Records

Student records are maintained to:

- **Ensure student safety and wellbeing**, including tracking behavioral incidents and protection cases.
- **Monitor academic progress**, attendance, and extracurricular participation to support personalized learning and achievement.
- **Support inclusive education**, particularly through Documented Learning Plans (DLPs) for students with additional learning needs.
- **Comply with reporting obligations** to ADEK and other stakeholders.
- **Facilitate smooth transitions**, such as school transfers or graduation documentation.

3.2 Medical Records

Medical records are collected and stored to:

- **Provide appropriate treatment in emergencies**, ensuring staff are aware of medical conditions that may require urgent care.
- **Comply with ADEK and Department of Health (DoH) requirements**, including the School Screening Standard and parental access protocols.
- **Enable safe participation in school sports**, by ensuring PE teachers and coaches are informed of relevant medical conditions.

These records are securely stored and accessed only by authorized personnel such as school nurses, with strict controls on duplication and external sharing.

3.3 Staff Records

Staff records are maintained to:

- **Manage employment and HR functions**, including contracts, benefits, and performance evaluations.
- **Support professional development**, tracking qualifications, training, and attendance.
- **Ensure accountability**, by documenting professional conduct and investigation outcomes.
- **Fulfill legal and regulatory obligations**, including reporting to ADEK and other authorities.

3.4 Financial Records

Financial records are collected to:

- **Ensure financial transparency and accountability**, both internally and externally.
- **Support budgeting and strategic planning**, aligned with ADEK's financial audit policies.
- **Comply with Financial Law No. 1 of 2017**, including retention and reporting requirements.

3.5 Administrative Records

Administrative records are maintained to:

- **Support daily operations**, including facilities management, visitor logs, and legal documentation.
- **Enable strategic planning and inspections**, through self-evaluation forms and committee records.
- **Ensure compliance with ADEK policies**, particularly in areas like infrastructure and HR.

3.6 Governance Records

Governance records are collected to:

- **Support long-term planning**, through development plans and annual reports.
- **Maintain transparency and accountability**, by sharing relevant governance documents with ADEK and stakeholders.

4. Resources for Record Management

Records are stored using:

- **Digital Systems**: School-managed servers, secure cloud storage, encrypted databases.
- **Physical Systems**: Archive rooms with controlled access, secure filing cabinets.

5. Modes of Storage

- **Student and Staff Records**: Primarily stored in encrypted digital systems; sensitive documents may be kept in secure physical archives.
- **Medical Records**: Stored in the school clinic system with restricted access.
- **Financial and Governance Records**: Digitally archived with backup protocols.
- **Administrative Records**: Combination of digital and physical formats, depending on operational needs.

6. Roles and Responsibilities

- Records are **classified** based on sensitivity and access level.
- Only **authorized personnel** may create, access, modify, or dispose of records.
- The **School Director** oversees compliance and incident documentation.
- Staff are trained on data handling and confidentiality protocols.

Classification Mechanisms for Access and Disposal

- All records are **classified based on sensitivity**, with access levels defined as:
  - **Full Access**: Granted to designated personnel with direct responsibility for the data (e.g., School Director, HR Manager, School Nurse).
  - **Limited Access**: Granted to staff who require partial access for operational purposes (e.g., teachers accessing student academic data).
  - **No Access**: All other staff and external parties without authorization.
- Disposal procedures are aligned with classification levels to ensure **secure and compliant destruction**, using approved methods and personnel only.

7. Data Protection Plan

The school's data protection practices are governed by its **General Privacy Notice**, which outlines the principles, responsibilities, and procedures for handling personal data. These practices are designed to ensure compliance with:

- **Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data**
- **ADEK School Digital Policy**

7.1 Breach Reporting and Handling Procedures

The school has established protocols for **identifying, reporting, and responding to data breaches**, in line with the **ADEK School Safeguarding Policy**.

- Any suspected or confirmed breach must be:
  - **Reported immediately** to the School Director who will notify the Regional Director.
  - **Documented and investigated**, with findings recorded and stored securely.

  - **Communicated to ADEK and affected parties**, where required by law.
- Preventive measures include regular staff training, system audits, and access control reviews.

7.2 Compliance Monitoring and Digital Incident Documentation

- The school conducts **routine audits and compliance checks** to ensure adherence to the Data Protection Plan and relevant laws.
- All **digital incidents** (e.g., unauthorized access, system failures, data loss) are:
  - **Recorded and documented** in a secure log.
  - **Signed off by the School Director** for accountability.
  - **Reviewed periodically** to identify trends and improve preventive strategies.

8. Record Preservation Schedule

The school maintains a structured record preservation schedule to ensure that all records are retained for appropriate durations based on their type, purpose, and regulatory requirements. This schedule supports operational continuity, legal compliance, and data protection obligations.

8.1 Student Records

- **Retention Period**: All student records—including enrollment data, academic achievements, attendance, behavioral reports, and disciplinary actions—shall be retained for a **minimum of five (5) years** following the student's departure from the school.
- **Purpose**: To support future academic verification, regulatory audits, and parental requests.

8.2 Graduation Records

- **Retention Period**: Graduation records, including certificates and final transcripts, shall be retained **indefinitely**.
- **Purpose**: To ensure lifelong access for alumni and verification by institutions or employers.

8.3 Staff Records

- **Retention Period**: Staff records shall be retained for a **minimum of five (5) years and a maximum of seven (7) years** following the end of employment.
- **Extended Retention**: Records may be retained beyond seven years if deemed operationally necessary (e.g., for legal, pension, or re-employment purposes).
- **Purpose**: To support HR audits, legal inquiries, and employment verification.

8.4 Administrative, Financial, and Governance Records

- **Retention Period**: These records shall be retained for a **minimum of five (5) years**.

- **Purpose**: To support financial audits, strategic planning, regulatory reporting, and institutional memory.

8.5 Reference to Privacy Policy

The **retention policy for personal data**—including conditions for extended retention, anonymization, and disposal—is detailed in the **School General Privacy Notice**, which governs how personal data is handled in accordance with:

- **Federal Decree Law No. (45) of 2021**
- **ADEK School Digital Policy**

9. Record Disposal Procedures

The school is committed to ensuring that all records are disposed of securely, responsibly, and in accordance with applicable laws and policies. Disposal procedures are designed to protect personal data, maintain operational integrity, and support environmental sustainability.

9.1 Disposal Timelines

- Records are disposed of based on the durations outlined in the **Record Preservation Schedule** (see Section 8).
- Disposal timelines vary by record type, with specific retention periods defined for student, staff, financial, administrative, and governance records.

9.2 Authorized Personnel

- Only **designated and trained personnel** are permitted to carry out record disposal activities.
- Access to disposal processes is restricted to staff with appropriate clearance, as determined by the school's data classification protocols.

9.3 Disposal Standards and Methods

- Disposal is conducted in accordance with:
  - **ADEK guidelines**, including the School Digital Policy and Sustainability Policy.
  - **UAE federal regulations**, including data protection and environmental standards.
- Disposal methods include:
  - **Secure shredding** for physical documents.
  - **Permanent deletion** and **data wiping** for digital records.

9.4 Documentation and Audit Trail

- The school maintains **proof of destruction** for all disposed records, including:
  - Disposal logs.

  - Certificates of destruction (where applicable).
  - Staff signatures and timestamps.
- These records are retained for audit and compliance purposes.

9.5 Regular Data Clean-Ups

- The school implements **routine data clean-up procedures** to:
  - Remove outdated or redundant records.
  - Ensure systems remain efficient and secure.
  - Support compliance with data minimization principles under UAE law.

10. Student Record Transfer Procedures

The school ensures that student records are transferred securely, accurately, and in a timely manner when a student moves to another educational institution, whether within or outside the UAE. These procedures are designed to protect student privacy, support continuity in education, and comply with regulatory requirements.

10.1 Transfer Scope

Upon a student's transfer, the school shall prepare and transmit the following records:

- **Academic Records**: Including progress reports, achievement data, and any documented learning plans (DLPs).
- **Administrative Records**: Such as transfer certificates, enrollment history, and attendance logs.
- **Other Relevant Documents**: Including behavioral reports, medical summaries (if applicable), and any official communications with ADEK or other stakeholders.

10.2 Parental Consent

- The school shall **obtain written consent from the parent(s)** or legal guardian before transferring any student information to a third party, including the receiving school.
- Consent forms shall clearly specify:
  - The types of records to be transferred.
  - The recipient institution.
  - The purpose of the transfer.

10.3 Compliance with ADEK Policy

- All transfers shall be conducted in accordance with the **ADEK School Student Administrative Affairs Policy**, ensuring:
  - **Efficiency and accuracy** in the transfer process.
  - **Secure transmission** of records, whether physical or digital.
  - **Confirmation of receipt** by the receiving institution, where applicable.

10.4 Documentation and Tracking

- The school shall maintain a **record of all transfers**, including:
  - Date of transfer.
  - Name of receiving institution.
  - Type of records transferred.
  - Proof of parental consent.
- These logs shall be retained for auditing and compliance purposes.

11. Record Preservation and Transfer in Case of School Closure

In the event of a school closure, it is critical to ensure the secure preservation and appropriate transfer of all school records to protect the rights of students, staff, and stakeholders, and to maintain compliance with ADEK regulations.

11.1 Submission of Preservation/Transfer Plan

- Schools must prepare and submit a **Record Preservation and Transfer Plan** to ADEK prior to closure.
- The plan must detail:
  - The types of records to be preserved or transferred.
  - The method of preservation (digital or physical).
  - The designated custodians of the records.
  - The timeline and procedures for transfer or archiving.

11.2 Secure Transfer and Archiving

- Records shall be **securely transferred or archived** in accordance with ADEK guidelines and UAE data protection laws.
- Student records, including academic progress, graduation documentation, and transfer certificates, must be:
  - Transferred to the receiving institution upon request and with parental consent.
  - Archived digitally in a secure format if no transfer is requested.
- Staff, financial, administrative, and governance records must be:
  - Archived securely for the duration specified in the Record Preservation Schedule.
  - Made accessible to ADEK for auditing or legal purposes.

11.3 Custodianship and Access

- The school shall designate **authorized personnel or entities** responsible for maintaining access to archived records post-closure.
- These custodians must ensure:
  - Continued compliance with data protection and privacy regulations.

- Timely response to legitimate requests for access from ADEK, parents, or former staff.

11.4 Communication with Stakeholders

- The school shall **inform parents, staff, and other stakeholders** of the closure and the procedures for accessing records.
- Clear instructions shall be provided on how to request records after closure, including contact details of the designated custodian.

12. Data Reporting Responsibilities

- Schools shall report data in line with the **ADEK School Reporting Policy**, ensuring accuracy, timeliness, and compliance with regulatory requirements.