

TAMOS Education collects and uses personal information (referred to in the Kazakh Data Protection Act as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information to ensure that the school complies with its statutory obligations.

The school is a “data controller”. The school issues a fair processing notice to all pupils and parents that summarizes the information held on pupils, why it is held and any other organizations it may be passed on to.

## **PURPOSE**

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with government guidelines, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities and will adhere to this policy.

### **What is Personal Information / data?**

Personal information or data is information, which relates to a living individual who can be identified from that data, or from that data in addition to other information available to them. Personal data includes (but is not limited to) an individual’s, name, address, date of birth, photograph, bank details and other information that identifies them.

### **What is Sensitive Personal Data?**

Sensitive personal data includes: information as to an individual’s racial or ethnic origin, their political opinions, religious beliefs or beliefs of a similar nature, whether they are a member of a trade union, their physical or mental health or condition, sexual life, the commission or alleged commission of an offence and any proceedings for an offence committed or alleged to have been committed by them, the disposal of those proceedings or the sentence of any court in such proceeding.

## **DATA PROTECTION PRINCIPLES**

There are eight data protection principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for one or more specified and lawful purpose;
3. Personal data shall be adequate, relevant and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data processed for any purpose shall not be kept for longer than necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of the data subject under Kazakh government legislation;
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security;

8. Personal data shall not be transferred to a country or territory outside the Kazakhstan, unless that country or territory ensures an adequate level of data protection.

### **GENERAL STATEMENT**

The school is committed to maintaining the above principles at all times. Therefore, the school will:

- Inform individuals why personal information is being collected;
- Inform individuals when their information is shared, and why and with whom unless there are legal reasons not to do this;
- Obtain consent before processing Sensitive Personal Data, even if consent is implied within a relevant privacy notice, unless one of the other conditions for processing Data applies;
- Check the accuracy of the information it holds and review it at regular intervals;
- Ensure that only authorized personnel have access to the personal information whatever medium (paper or electronic) it is stored in;
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorized disclosure, irrespective of the format in which it is recorded;
- Ensure that personal information is not retained longer than it is needed;
- Ensure that when information is destroyed that it is done so appropriately and securely;
- Share personal information with others only when it is legally appropriate to do so;
- Set out a procedure to comply with the duty to respond to requests for access to personal information, known as Subject Access Requests;
- Ensure that personal information is not transferred outside Kazakhstan without the appropriate safeguards;
- Ensure all staff and employees are aware of and understand these policies and procedures;
- Provide a clear procedure for considering complaints.

### **KEY MEASURES (CONTENT OF POLICY)**

A. Details of all personal data which will be held, the format in which it will be held and the purpose(s) for collecting the data in each case.

The staff personal data records held by the school include:

- Name, address and contact details;
- Original records of application and appointment;
- Record of appointments to promotion posts;

- Details of approved absences (career breaks, parental leave, study leave etc.);
- Details of work record (qualifications, classes taught, subjects etc.);
- Details of complaints and/or grievances including consultations or competency discussions, action/improvement/evaluation plans and record of progress.

Purpose for keeping staff records include:

- to facilitate the payment of staff;
- to facilitate pension payments in the future;
- a record of promotions made;
- references;
- discipline issues;
- leave taken;
- sick leave;
- observation and assessment;
- training.

Student records include:

- Information which is given and recorded at enrolment, including:
  - name, address and contact details, PPS number;
  - names and addresses of parents/guardians and their contact details;
  - religious belief;
  - racial, ethnic or national origin;
  - any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply.
- Information on previous academic record;
- Psychological assessments;
- Attendance Records;
- Academic record – subjects studied, class assignments, examination results as recorded on official school reports;
- Records of significant achievements;
- Records of disciplinary issues and/or sanctions imposed;
- Other records e.g. records of any serious injuries/accidents etc.

Format: The format in which these records exist:

- a manual record (personal file within filing system);
- computer records.

Purpose for keeping student records include: to enable each student to develop his/her full potential, to comply with legislative or administrative requirements, to ensure that eligible students can benefit from the relevant additional teaching or financial supports, to support the



