

English Version

Records Policy

Horizon Private School - American Branch

Document Control

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Policy Purpose and Philosophy

At Horizon Private School (HPSB), we view record-keeping not merely as an administrative duty, but as an act of stewardship. The creation and maintenance of clear, accurate, and secure records is essential to safeguarding the history of our learners' journeys and ensuring the integrity of our school operations.

This policy establishes the framework for how HPSB creates, manages, stores, and eventually disposes of records. Our approach is grounded in **"Warm Authority"**: we protect data rigorously because we respect the dignity and privacy of our learners, their families, and our staff. We ensure that information is accessible to those who need it to support the learning

environment, while strictly adhering to UAE data protection laws.

Scope and Application

This policy applies to:

- **All Staff:** Academic, administrative, and operations personnel who create or access records.
- **All Record Types:** Physical (hard copy) and Digital (soft copy), including data stored on school servers, cloud subscriptions, and approved platforms (e.g., Toddle, ESIS).
- **All Domains:** Learner affairs, staff employment, finance, governance, and health & safety.

Legal Framework and Compliance

This policy is developed in strict compliance with the following regulations:

- **ADEK School Records Policy** (Version 1.1, September 2024).
- **Federal Decree-Law No. (45) of 2021** Concerning the Protection of Personal Data.
- **Federal Decree-Law No. (31) of 2021** (Crimes and Penalties).
- **Department of Health (DoH) School Screening Standard (2023).**
- **Financial Law No. (1) of 2017** for the Abu Dhabi Emirate.
- [ADEK School Digital Policy](#).

Definitions

- **Records:** Information (in hard or soft copy) regarding school operations, learner affairs, staff, financial matters, and other aspects of school functioning.
- **Personal Data:** Any data relating to an identified or identifiable natural person (e.g., learner, parent, staff member).
- **Sensitive Data:** A sub-category of personal data requiring higher security, including medical records, behavioral incident reports, and safeguarding cases.
- **Archive:** Secure storage for inactive records that must be retained for legal or historical reasons.
- **Additional Learning Needs:** Individual requirements for support, modifications, or accommodations within a school setting on a permanent or temporary basis (e.g., learners of determination, gifted/talented).
- **Extracurricular Activities (ECA):** Organized activities usually external to the school curriculum, such as sports, clubs, and trips.

Roles and Responsibilities

The Principal

- Approves the School Records Policy and ensures its implementation.
- Signs off on every documented digital security incident for auditing purposes.
- Maintains access to school financial records alongside the Governing Board.

Compliance Officer

- Outlines and implements processes for the disposal of records.
- Monitors compliance with the Record Preservation Schedule.
- Ensures the classification of documents for authorized access

School Nurse

- Creates and maintains detailed, secure, and confidential learner medical records.
- Creates records for new learners and transfer learners who lack previous school health services.
- Manages parent access requests and obtains DoH/parent approval for external record release.

IT & Digital Lead:

- Implements the **Data Protection Plan** in compliance with the ADEK School Digital Policy.
- Establishes mechanisms for identifying, reporting, and handling security breaches.
- Ensures digital storage mechanisms are secure and accessible only to authorized staff.

PE Teachers and Coaches

- Must access medical records to be aware of conditions impacting participation and to address incidents.

Policy Statements and Procedures

Data Privacy and Classification

To maintain trust with our community, HPSB employs a classification system for documents to control access:

- **Classification:** Documents are classified for authorized access, use, and disposal based on data sensitivity standards.
- **Breach Protocol:** Any digital incident must be recorded, documented, and signed by the Principal. These mechanisms must align with the ADEK School Safeguarding Policy.

Learner (Student) Records

We maintain comprehensive records to support each learner's educational journey. HPSB maintains individual student records including:

- Personal info, attendance, and academic progress.
- Extracurricular participation and achievement.
- Behavioral incidents.
- Cases on student protection, in line with the ADEK School Student Protection Policy.
- Documented Learning Plans (DLPs) for learners with Additional Learning Needs.
- Medical Records Access: Families may view records upon request. However, the school shall not photocopy or remove student records from the school clinic.

Retention and Preservation

- **Learner Records:** Retained for at least 5 years after the learner leaves.
- **Graduation Records:** Retained indefinitely.
- **Staff Records:** Retained for at least 5 years and at most 7 years following employment.
- **Administrative & Governance Records:** Retained for at least 5 years.
- **Financial Records:** Retained per Financial Law No. 1 of 2017.

Storage and Disposal

- **Storage:** Mechanisms must be secure, accessible only to authorized staff, and provide appropriate environmental conditions.
- **Disposal:** HPSB adheres to disposal guidelines for each document type as classified for access.
- **Evidence:** The school maintains proof of destruction and implements regular data clean-ups.

School Transfers and Closure

When a learner transitions to a new school, we support this change by efficiently transferring key academic and behavioral data.

- **Transfers:** Parent permission must be obtained before transferring student information to any third party.
- **School Closure:** In the event of closure, HPSB shall provide ADEK with a clear plan regarding the preservation or transfer of records.

Monitoring, Review, and Communication

Monitoring: The school must maintain proof of destruction and regular data clean-ups to monitor compliance.

Review: This policy is effective from AY 2024/25 and full compliance is expected by AY

2025/26.

Communication: Staff roles regarding record creation and disposal must be clearly defined and communicated.

References and Related Documents

- **External (ADEK):**

- [ADEK School Records Policy \(v1.1, September 2024\).](#)
- [ADEK School Student Administrative Affairs Policy.](#)
- [ADEK School Safeguarding Policy.](#)
- Federal Decree-Law No. (45) of 2021 (Data Protection).