Sunrise English Private School
- L.L.C - O.P.C
Education and Knowledge Department, License No. 1/466 - Date 15/04/2008
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مدرسة الشروق الانجليزية الخاصة
-ذ.م.م - ش.ش.و
دائرة التعليم والمعرفة ترخيص رقم ١/٤٦٦ بتاريخ ١٥/٠٤/ ٢٠٠٨
صندوق البريد ٧١٣٥٦ أبوظبي
تليفون رقم: ٥٥٢٩٩٨٩ ٩٧١٢+، فاكس: ٥٥٢٧٨٣٧ ٩٧١٢+
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DIGITAL POLICY

DOCUMENT TYPE	POLICY
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SEPS DIGITAL POLICY

1. INTRODUCTION

In today's world, the ability to navigate the digital space is essential for students to effectively participate in education, work, and everyday life. At Sunrise English Private School, Abu Dhabi, we recognize our responsibility to integrate digital skills development into all aspects of teaching and learning. Equally important is our commitment to ensuring the safety and security of students while they engage with digital technology. This Digital Policy outlines the fundamental requirements for the school in formulating and implementing a comprehensive digital strategy. It also establishes guidelines for delivering education on digital safety and promoting the responsible and secure use of technology within our learning environment.

2. PURPOSE

The **School Digital Policy** of ***SEPS*** is designed to:

- Establish and implement a comprehensive digital strategy in alignment with **ADEK** requirements, ensuring the effective use of technology, development of digital competencies, secure digital infrastructure, and allocation of necessary resources.
- Foster the growth of students' **digital skills and competencies**, enabling them to fully leverage technology for enhanced learning experiences.
- Educate students on **responsible and safe online practices**, equipping them to navigate the digital world while being protected from inappropriate or harmful content and interactions.
- Implement robust **systems, mechanisms, and procedures** to ensure a **secure, balanced, and responsible** digital environment within the school.
- Ensure full compliance with the **Monitoring and Control Center** regulations and **Federal Decree Law No. (45) of 2021 on the Protection of Personal Data**, safeguarding the collection, processing, and storage of personal data in a secure and ethical manner.

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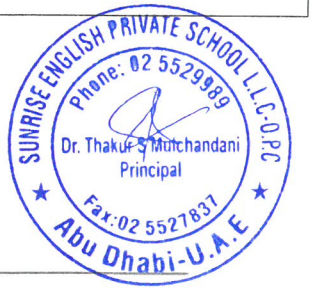
3. DEFINITIONS

Additional Learning Needs	Individual requirements for additional support, modifications, or accommodations within a school setting on a permanent or temporary basis in response to a specific context. This applies to any support required by students of determination and those who have special educational needs and/or additional barriers to learning, access, or interaction in that specific context (e.g., dyslexic, hearing or visually impaired, twice exceptional, or gifted and/or talented). For example, a student with restricted mobility may require lesson accommodations to participate in Physical Education and building accommodations to access facilities but may not require any accommodations in assessments. Equally, a student with hearing impairment may require adaptive and assistive technology to access content in class and may also require physical accommodations (e.g., sit in the front of the class to be able to lip read) to access learning.
Assistive Technology	Any item, piece of equipment, software program, or product system that is used to increase, maintain, or improve the functional capabilities of persons with disabilities (ATIA, n.d.).
Bring Your Own Device (BYOD)	Practice wherein schools allow staff and/or students to do their work on personally owned digital devices.
Bullying	Repeated physical, social, or verbal aggression exercised by students who feel they are in a position of power against other students who are perceived weaker or powerless, to achieve specific gains or draw attention, in a way that hurts the student physically and/or emotionally. Bullying can be committed by groups or individuals, in online (cyberbullying) or offline settings. The *National Policy for the Prevention of Bullying in Educational Institutions* (MoE, n.d.) provides a complete framework for bullying and cyberbullying.
Cyberbullying	Bullying that takes place online "using the means of communication and information technology to insult, use profanity towards, threaten with violence, slander, or blackmail someone" (MoE, 2020). Online bullying can follow the bullied student wherever they go via social networks and mobile phones and has a wider reach than bullying in the real world.
Cybersecurity Incident	A breach that threatens the confidentiality, integrity or availability of an organization's information systems or sensitive data (IBM, n.d.).
Data Protection	The process of safeguarding data from corruption, compromise, unauthorized access, or loss and providing the capability to restore the data to a functional state should something happen to render the data inaccessible or unusable (SNIA, n.d.).
Digital Device	A device used for audio, video, or text communication, or any other type of computer or computer-like instrument, including, but not limited to cell phones, smart watches, tablets, and laptops.



Digital Incident	An instance where a member of the school community engages in the inappropriate use of digital technology. This includes a breach of the reasonable usage policies, the accessing of inappropriate content, inappropriate behaviors or communications, cyberbullying, and/or any other breach of school regulations in an online setting.
Digital Fluency	The state of being a competent, confident, safe, responsible, creative, and curious user of technology.
Documented Learning Plan	A plan which outlines any personalized learning targets, modifications to curriculum, additional support, or tools for learning which are agreed by school staff, parents, and students (where appropriate), including Individual Educational Plans (IEP), Individual Support Plans (ISP), Individual Learning Plans (ILP), Behavior Support Plans (BSP), Advanced Learning Plans (ALP), etc. This may be to address any specific identified academic, behavioral, language, or social and emotional need.
Parent	The person legally liable for a child or entrusted with their care, defined as the custodian of the child as per the Federal Decree Law No. 3 of 2016 Concerning Child Rights (Wadeema).
Personal Information	Information relating to individuals who are identifiable directly from the information in question, or who can be indirectly identified from that information in combination with other information.
Risk Assessment	A systematic process of evaluating the potential risks that may be involved in an activity or undertaking.
Safeguarding	Protecting students from the risks of harm, including maltreatment and other types of risks that impact their overall health and development, wellbeing, and safety.
SaaS Security Posture Management (SSPM)	A type of automated security tool for monitoring security risks in software- as-a-service (SaaS) applications. It also identifies misconfigurations, unnecessary user accounts, excessive user permissions, compliance risks, and other cloud security issues.
Social Media	A means of social interaction in which people create, share, and/or exchange information and ideas in virtual communities and networks, including, but not limited to, platforms such as Facebook, Twitter, Instagram, LinkedIn, and YouTube (Tufts University, n.d.).
Visitor	For the purpose of this policy, a visitor is any temporary visitor (e.g., a parent or a relative of a student, prospective student and their parents, inspectors, contractors, etc.) entering the school premises. An invited visitor is anyone visiting the school on a temporary basis to interact with students (i.e., a speaker, career fair representative, etc.) and includes volunteers, who are engaged by an educational institution on a non-remunerated basis to interact with students (e.g., parent chaperones, etc.).

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SEPS has developed and will implement the following documents, and make them available on the school website in both Arabic and English, in line with the requirements of this Policy:

1. Digital strategy (Page-4)
2. Responsible usage policies (Page -7)
3. Framework for the selection of external providers and products (Pg-13)
4. Data and Cybersecurity Infrastructure (Page - 14)
5. Response plan in relation to cybersecurity incidents (Page -16)
6. School data protection plan and policy (Page- 18)
7. Digital media policy and social media policy (Page- 21, 22)

4. DIGITAL STRATEGY AND OVERSIGHT

4.1 Digital Strategy: School will develop and implement a digital strategy that outlines and provides rationale for their digital goals over a 5-year time frame. The strategy includes:

1. Strategic Direction for Technology Deployment

SEPS leverages the **ETH Digital Campus** to drive improved student outcomes by enhancing teaching and learning and streamlining school administration. The platform supports student performance tracking, and efficient operational workflows, enabling a holistic approach to academic and administrative excellence. Digital lesson planning is done by teachers to ensure structured, engaging, and resource-rich instruction that aligns with curriculum goals and supports differentiated learning.

2. Assistive Technology for Inclusion

While interactive smartboards are already in use, the school continues to enhance accessibility by incorporating additional tools to ensure equal learning opportunities for all students.

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3. **Student Digital Skills and Competencies**

SEPS aims to develop students' digital literacy, responsible online behaviour, and 21st-century skills. Integration of digital tools into the curriculum, use of the LMS, and exposure to coding, robotics, and research-based learning support this goal.

4. **Digital Infrastructure, Software, and Hardware Plans**

Plans include upgrading teacher laptops, expanding smartboards to all secondary classes, enhancing lab facilities, and procuring educational software aligned with curriculum goals. As part of this, the school will also upgrade its network and infrastructure to support the implementation of a **BYOD (Bring Your Own Device)** model, enabling greater student access to digital learning resources.

5. **Digital System Security Mechanisms**

The school ensures data security through controlled user access, regular audits, secure network infrastructure, and strict adherence to digital safety policies. Security is further reinforced through the use of firewalls, updated antivirus software, encrypted platforms, and restricted administrative privileges to safeguard sensitive information and prevent cyber threats.

6. **Future-Proofing Digital Infrastructure**

Ongoing investments in scalable platforms like ETH, cloud-based storage, and adaptable learning tools ensure that the school's digital environment remains responsive to evolving educational needs. Emerging technologies such as robotics, artificial intelligence, and coding platforms are being integrated and expanded to equip students with skills relevant to the future.

7. **Resources and Investment Requirements**

Investment will focus on device upgrades, infrastructure enhancements, licensing fees, cybersecurity tools, and assistive technologies. A phased budgeting approach will align costs with annual school development plans.

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8. **Staff Training and Professional Development**
   Regular training sessions will be conducted to build staff proficiency in digital platforms, instructional technology, cybersecurity, and emerging tools. Peer-led workshops and external certifications will support continuous professional growth.

9. **Increase Awareness of Emerging Technologies**
   SEPS will promote awareness and exploration of technologies such as artificial intelligence, virtual reality, and data analytics through staff development programs, student enrichment activities, and curriculum integration where appropriate.

4.2 Oversight: The **Digital Wellbeing Committee or Lead** is responsible for overseeing the school's digital strategy and associated policies through the following actions:

1. Develops and implements the school's digital strategy.
2. Conducts an annual review of the digital strategy and its implementation:
   a. Monitoring progress toward student learning goals and school development and procurement plans.
   b. Evaluating technology, software, and online platforms to ensure they align with the strategy's objectives.
   c. Testing and conducting risk assessments of the school's digital sand infrastructure (e.g., backup recovery) to maintain security and functionality.
   d. Reviewing the effectiveness of the school's data protection and cybersecurity measures.
   e. Reassessing the school's technological needs based on feedback from staff, parents, and students to inform procurement and digital development planning.

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f. **Reevaluating staff digital development needs** and identifying additional training where necessary.

3. Develop and implement and review other school policies required to be created in line with this policy.

4. Engage with relevant stakeholders (e.g., Head of IT) to inform its decisions.

4.3 Schools has appointed a staff member to liaise with ADEK for matters related to digital competency, safety, and security.

5. DIGITAL COMPETENCIES

5.1 Student Outcomes: SEPS has defined after implementing digital competencies and expected learning outcomes into the curriculum for each grade. The school ensures that the necessary digital infrastructure and resources are in place to support all students, including those with additional learning needs, in alignment with the **School Inclusion Policy**.

5.2 Staff Training: SEPS provides **role-specific training** to staff to equip them with the knowledge and skills needed to support the objectives of this policy. The training includes topics such as the **school's digital infrastructure and policies, student digital learning outcomes, data protection, cybersecurity, and digital safety measures** implemented by the school.

6. RESPONSIBLE USAGE AND DIGITAL SAFEGUARDING

6.1. Responsible Usage Policy: SEPS has developed and communicated responsible digital usage policies for students, parents, staff, and visitors. These policies have set out what these groups are permitted/prohibited to do on the school's premises, network, and systems, and has included:

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General Principles

- **Respectful Communication**: All members of the school community are expected to communicate with respect, kindness, and professionalism in digital spaces. Harassment, bullying, or discrimination will not be tolerated, whether online or offline.
- **Safety and Security**: Students and staff must ensure their devices are used securely, and they should follow safety protocols to protect personal information, passwords, and online identities.
- **Responsible Digital Citizenship**: Users are expected to demonstrate good digital citizenship by being mindful of their online behavior and understanding the impact of their actions in both the digital and physical worlds.
- **Academic Integrity**: Technology should be used to support learning, creativity, and collaboration. Cheating, plagiarism, and using unauthorized materials are strictly prohibited.
- Visitors who are granted access to the school's digital devices, internet, or network systems are expected to use them responsibly, solely for authorized purposes, and in accordance with the school's ICT and data protection policies. Any misuse, unauthorized access, or inappropriate behavior may result in access being revoked and further action as necessary.

Acceptable Use

- **Educational Purposes**: Devices and the internet should be primarily used for academic purposes, including research, collaboration, assignments, and learning activities. Personal use should be limited to non-school hours and not interfere with educational goals.
- **Appropriate Content**: Students and staff must refrain from accessing, creating, or sharing inappropriate content, including but not limited to explicit, violent, or discriminatory material.

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- **Social Media**: When using social media platforms, students and staff should represent themselves and the school community positively. Any posts or comments that are harmful, disrespectful, or violate the school's values are prohibited.
- **Cybersecurity**: Users should practice good cybersecurity habits by not sharing passwords, avoiding clicking on suspicious links, and reporting any security concerns immediately.

Prohibited Activities

- **Cyberbullying**: Bullying, harassment, or intimidation of others through digital platforms is strictly prohibited. This includes sending hurtful messages, sharing false information, or excluding others from online activities.
- **Inappropriate Use of School Devices**: Using school-owned devices for non-educational purposes, including excessive gaming, social media, or non-school-related internet browsing, is prohibited.
- **Accessing Restricted Content**: Users must not attempt to bypass security measures or access websites, apps, or content deemed inappropriate or blocked by the school's network.
- **Illegal Activities**: Engaging in illegal activities such as hacking, illegal downloading, or accessing unauthorized data is strictly prohibited.
- **Vandalism**: Students and staff must not engage in activities that damage or tamper with school technology, including viruses, malware, or malicious software.

Digital Well-being

- **Healthy Screen Time**: Students should be encouraged to balance screen time with other offline activities such as physical exercise, reading, and outdoor play. Teachers and staff will model appropriate screen-time usage.
- **Mental Health**: The school encourages students to seek help if they encounter issues related to online harassment, stress, or other digital-related challenges. Support services are available through counselors and teachers.

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- **Breaks and Boundaries:** Teachers should ensure that students take regular breaks from digital devices during lessons and that the use of technology does not overwhelm students.

Privacy and Data Protection

- **Student Privacy**: Personal information about students must be protected in compliance with applicable privacy laws (such as FERPA in the U.S.). Students should be taught not to share personal details (e.g., home addresses, phone numbers) online.
- **Monitoring and Consent**: The school reserves the right to monitor the use of school-issued devices and networks to ensure compliance with this policy. Students and parents/guardians must give consent for the monitoring and use of technology resources.
- **Data Security**: Users must be cautious about downloading files or clicking on links that could compromise their data security. Students should only use approved software and applications.

Reporting Violations

- **Reporting Mechanisms**: Any student, teacher, or staff member who encounters inappropriate content, cyberbullying, or any other violations of this policy should report them immediately to a teacher, school counselor, or the school administration.
- **Confidentiality**: All reports will be treated confidentially, and the school will take appropriate steps to investigate and resolve the issue.
- **Whistleblower Protection**: Students and staff who report violations in good faith will not face retaliation.

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Enforcement and Consequences

a. Disciplinary Actions: Violations of this policy may result in consequences ranging from a warning to suspension of digital access, detention, or even expulsion, depending on the severity of the breach.
b. Behavioral Interventions: In some cases, students may be required to participate in digital citizenship training or counseling to address their behavior.
c. Restorative Practices: The school may use restorative practices to address conflicts or violations, promoting understanding and reconciliation.

Periodic Review and Updates

- The Responsible Digital Usage Policy will be reviewed regularly and updated as needed to address new technologies, emerging issues, and best practices in digital education.

6.2 Safeguarding Students: SEPS implements educational programs and effective systems to protect students from the online risks outlined below:

1. Online risks posed to students are as follows:

a. Exposure to content that is inappropriate, illegal, or may harm their wellbeing.

b. Exposure to unsafe online interaction (e.g., interaction with users with fake profiles).

c. Personal online behavior that can lead to harm for self or others (e.g., engaging in cyberbullying).

d. Scams and finance-related risks such as gambling and phishing.

2. SEPS implements the following programs, systems, mechanisms, and procedures to safeguard students against online risks and promote their wellbeing:

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a) An age-appropriate awareness program for all students, covering the benefits of technology, awareness of online risks, self-assessment of online risks when using technology, online safety measures, and the impact of digital habits on wellbeing (e.g., the impact of duration of usage of digital devices).

b) Appropriate filtering and monitoring systems to monitor student internet use on school devices and systems.

c) Regular analysis of students' internet usage and web filter violations to identify potential adverse trends or problems.

d) Procedures to identify and support students who appear to be developing risky, excessive, or illegal digital habits, such as digital addiction or gambling, in line with the School Student Mental Health Policy and the School Student Behavior Policy.

e) Mechanisms to enable safeguarding during activities conducted virtually (e.g., disabling private chat for students).

3.SEPS ensures there is a developmental purpose before allowing students to use the Internet during school hours.

6.3 Digital Incidents:

1. A digital incident occurs when a member of the school community engages in inappropriate use of digital technology. This includes a breach of reasonable usage policies, the accessing of inappropriate content, inappropriate behaviors or communications, cyberbullying, or any other breach of school regulations in an online setting.
2. Where a digital incident occurs during school hours or in settings covered in schools' digital policies, SEPS makes interventions and provide support to students and/or staff in line with the relevant policy (e.g., School Employment Policy, School Staff Wellbeing Policy, School Student Administrative Affairs Policy, School Parent Engagement Policy, School Student Behavior Policy, and the School Student Protection Policy). Where

required, SEPS reports digital incidents to ADEK and cooperate with the Abu Dhabi Police for investigations.

3. SEPS ensures that every digital incident is recorded, documented, and signed by the Principal and stored for auditing purposes, in line with the School Records Policy.

6.4 SEPS expects parents to actively monitor their children's use of digital devices outside school hours and premises to promote safe, responsible, and appropriate digital behavior.

7. DIGITAL INFASTRUCTURE

7.1 **Digital Devices**: Digital Devices: SEPS ensures that digital devices issued to members of the school community have appropriate security features. The school allows staff to access school-related data or systems on other devices or has a Bring Your Own Device (BYOD) policy for staff and students. SEPS has defined and implements digital safety precautions, including minimum device specifications and antivirus requirements.

7.2 **Digital Systems for Staff**: SEPS ensures that relevant staff members have access to digital systems provided by ADEK, including the Learning Management System.

7.3 **Distance Learning Readiness**: At SEPS distance learning is permitted only in exceptional situations, such as temporary school closures or prolonged hospitalization of the student.

7.4 **Assistive Technology**: SEPS provides assistive technology to students with additional learning needs as indicated in the Documented Learning Plan, in line with the *School Inclusion Policy*.

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7.5 External Providers and Products:

1. SEPS has a third-party risk assessment framework for selecting external IT service providers and products related to the school network, system, and infrastructure, including learning application providers and open-source applications. This framework shall include the following, at a minimum:
   a) Compatibility with existing school systems.
   b) Secure management of data.
   c) Compliance with cybersecurity standards and frameworks.
   d) Security against cyber threats.
   e) Service delivery and backup/ recovery provisions.
   f) Reputation and financial stability of the provider.
   g) Adherence of the vendor to the Federal Decree-Law No. (45) of 2021 on the Protection of Personal Data and the ADEK terms and conditions, copyright policy, and data privacy policy with regard to the collection, use, and disclosure of information.
   h) Where relevant (e.g., learning application providers), educational quality, and age-appropriateness of content.
2. School communicates to external vendors that the vendor is subject to the Federal Decree-Law No. (45) of 2021 on the Protection of Personal Data and the ADEK terms and conditions, copyright policy, and data privacy policy with regard to the collection, use, and disclosure of information.

8. DATA AND CYBERSECURITY

8.1 Secure Digital IT Architecture: SEPS has a robust secure digital infrastructure and ensure the relevant cybersecurity controls are implemented as follows:

1. Access Control
   a. Implement multi-factor authentication mechanisms across critical services.

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b. Define and enforce role-based access control to ensure users have appropriate permissions.

2. Data Encryption

a. Employ encryption for data in transit and at rest to safeguard sensitive information.

3. Network Security

a. Deploy next-generation firewalls and intrusion detection/prevention systems to protect against unauthorized access.
b. Ensure web filtering policies are enforced.
c. Ensure the ability to block inappropriate content.
d. Ability to detect infected machines across the school network.
e. Ensure identity-based firewalls are implemented to provide granular visibility on user browsing activity.
f. Established a unified security edge architecture for all internet browsing.
g. Regularly monitor and audit network traffic for unusual patterns.

4. Endpoint Protection

a. Install and update anti-virus/anti-malware software on all school-managed devices.
b. Implement hard disk device encryption and ensure regular security patching.

5. Data Backup and Recovery

a. Establish automated regular backup procedures for critical data.
b. Ensure backups are vaulted and stored offline.
c. Develop a robust disaster recovery plan to minimize downtime in case of a security incident.

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6. Data Security
    a. Establish data classification controls across school and student data.
    b. Implement Data Loss Prevention Tools to ensure data leaks or exfiltration is prevented.
7. Security Awareness Training
    a. Conduct regular training sessions for staff and students to raise awareness about cybersecurity threats and best practices.
8. Incident Response Plan
    a. Develop and regularly update an incident response plan to address security breaches promptly and effectively.
    b. Perform a tabletop cyber-attack simulation and exercise with school management involvement.
9. Physical Security
    a. Ensure secure access to physical servers, networking equipment, and other critical infrastructure.
10. Regulatory Compliance
    a. Ensure compliance with local and international data protection regulations and standards.
11. Monitoring and Logging
    a. Implement comprehensive monitoring systems to detect and respond to security incidents in real time.
    b. Maintain detailed logs for auditing and analysis purposes.
12. Secure Software Development
    a. Follow secure coding practices when developing or procuring educational software.
    b. Regularly update and patch software to address vulnerabilities.
13. Cloud Security

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a. If using cloud services, ensure the selected providers adhere to stringent security standards.
b. Implement proper configuration and access controls for cloud resources.
c. Integrate Cloud Services – Software as a Service (SaaS) with school identity services where possible.
d. Establish Cloud SaaS Security Posture Management capabilities.

14. Collaboration Security
    a. Secure communication and collaboration platforms to protect sensitive educational information shared among students and staff.
15. Third-Party Security
    a. Vet and monitor third-party vendors providing educational technology solutions to ensure they meet security standards.

8.2 System Maintenance: SEPS maintains and regularly update digital infrastructure, operating systems, security systems, and software, including antivirus protection software. SEPS regularly test the digital infrastructure and systems to ensure they are in good working condition.

8.3 Safe Use of External Learning Applications: SEPS has safeguarding mechanisms in place (e.g., single sign-on systems) to protect student and system security in the use of external learning applications.

8.4 Safe Virtual Interaction with Invited Visitors: SEPS seeks parents' consent for any live virtual interactions with invited visitors, inside or outside of class. All such interactions shall also be approved by ADEK, in line with the School Extracurricular Activities and Events Policy and the School Student Protection Policy.

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8.5 Backup and Storage: Regarding the onsite data storage systems, SEPS ensures that backups of important information, software, and configuration settings are performed at an appropriate frequency and retained for an appropriate period of time in line with the School Records Policy.

1. SEPS ensures that such backups are stored securely and separately from the school network.
2. Regarding the external cloud systems for storage, SEPS ensures that its data is synced with the cloud.

8.6 Cybersecurity Incidents: SEPS will develop response and business continuity plans to guide staff in the event of a cybersecurity incident, including the protocols for reporting the incident to the school leadership team and to ADEK, and the process for maintaining operational continuity:

1. School will not communicate any cybersecurity incident to external parties except for the service provider involved and ADEK.

2. SEPS adheres to all applicable laws and policies set out by the Department of Government Enablement and any other relevant authorities in the UAE, including the Federal Decree Law No. (34) of 2021 on Combatting Rumors and Cybercrimes.

9. DATA PROTECTION

9.1 SEPS Data Protection Policy: Sunrise English Private School (SEPS) is committed to ensuring that all personal information collected, stored, processed, or shared is handled with the highest standards of data protection. This policy complies with **Federal Decree Law No. (45) of 2021 on the Protection of Personal Data** and reflects our dedication to

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maintaining the privacy and trust of our stakeholders—students, parents, staff, and associated third parties.

1. Types of Personal Information Collected

SEPS may collect and process the following categories of personal information:

- Full name, date of birth, nationality, and gender
- Contact details (address, phone number, email)
- Academic records and student performance data
- Health and medical information (for emergencies and learning accommodations)
- Parent/guardian details and emergency contact information
- Identification documents (e.g., Emirates ID, passport)
- Staff employment records
- Attendance and behavioral records
- Images and video recordings (e.g., CCTV footage, school events)

2.Consent for Collection, Processing, and Storage

a. SEPS will obtain clear and informed consent from individuals (or legal guardians in the case of minors) before collecting, processing, or storing personal data.

b. Individuals have the right to **withdraw consent** at any time. Upon withdrawal, SEPS will cease processing the relevant personal data, unless required to retain it for legal or regulatory purposes.

3. Sharing and Disclosure of Personal Information

Personal data will only be shared with external parties under the following conditions:

- For regulatory reporting to authorized government entities such as **ADEK**
- When necessary for educational or administrative purposes, with the informed consent of the individual

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- In compliance with legal obligations or emergency requirements

a. Any third-party agreements involving personal data will include a **Non-Disclosure Agreement (NDA)**, stipulating that:

- Data cannot be shared or transferred within or outside the UAE without explicit written consent from ADEK
- Personal information shall only be processed for the specific purposes agreed upon
- Data shall be securely handled in compliance with this policy and UAE data protection law.

4. Data Security Measures

SEPS implements appropriate technical and organizational safeguards to protect personal data against unauthorized access, loss, or misuse. These measures include:

- Secure digital storage and encrypted systems
- Access controls and user authentication
- Regular audits and staff training on data privacy
- Use of firewalls and antivirus software
- Physical security controls for data storage devices

9.2 Sharing Data with ADEK: SEPS will provide accurate and up-to-date data to authorized ADEK personnel on request, in line with the Federal Decree Law No. (18) of 2020 on Private Education and its amendments and Law No. (9) of 2018 Concerning the Establishment of the Department of Education and Knowledge and in line with the ADEK terms and conditions, and data privacy policy with regard to the collection, use, and disclosure of information.

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1. School will inform parents of their obligations to share data with ADEK accordingly.

9.3 Data Protection Plan: SEPS will develop and annually reviews the data protection plan, in compliance with Federal Decree Law No. (45) of 2021 on the Protection of Personal Data and the amendments and the School Records Policy. The data protection plan shall set out the steps taken by the school to safeguard its organizational data, including data classification methods, authorization levels, protections against cybersecurity and other threats, and procedures for restoring backed-up information in case of breaches.

10. DIGITAL COMMUNICATIONS

10.1 Digital Media Policy: SEPS has implemented and monitors the Digital Media Policy, which governs the creation and publication of digital media.

The policy outlines the school's approach to the creation, use, storage, and sharing of digital media, including photographs, videos, and audio recordings involving students, staff, and school events. It ensures compliance with data protection laws and promotes safe, respectful, and ethical digital practices.

Consent and Permissions

- **Recording and Photography:**
  The school will **only capture photos or videos of students** after obtaining **written consent** from parents/guardians. The purpose of recording will be clearly communicated.
- **Publishing Content:**
  Separate consent is required to publish any student media on public platforms (e.g., website, social media).

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- **Withdrawal of Consent:**

  Parents may withdraw consent **at any time in writing**. Once withdrawn, the student will no longer appear in future recordings, and prior media will be removed where practical.

Storage and Security of Media

- All digital media will be stored on secure, access-controlled systems.
- Files are backed up and protected using **antivirus and encryption tools**.
- Access is limited to **authorized staff** for legitimate academic or operational purposes.

Use of Devices and Platforms

- **School Devices Only:**

  All digital media must be captured using **school-approved devices and platforms**.
- **Personal Devices:**

  Staff, students, and visitors may **not use personal devices or accounts** to record or share school-related content unless explicitly approved by administration.
- **Publishing Guidelines:**

  Only **designated staff** may post official school content online. Any use of student images must align with **consent records**.

Student and Staff Responsibility

- **Students** are expected to behave responsibly online and **report misuse** or inappropriate content to a teacher.
- **Staff** must model ethical digital use, **protect student privacy**, and supervise student media activities.
- **Visitors** must obtain **written permission** before taking photos, videos, or audio on campus.

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Breach of Policy

Violations of this policy may result in disciplinary actions, withdrawal of digital privileges, and/or legal consequences where applicable.

10.2 Social Media Policy: School will implement the Social Media Policy in relation to the use of social media by the school.

1. This policy governs the **use, management, and monitoring** of official school social media platforms to ensure responsible communication, maintain student privacy, and protect the school's reputation. It applies to all staff, students, and community members interacting with the school's official online presence.

Only **official accounts** authorized by school leadership may be used for communication or publishing on behalf of the school.

Account Access, Security & Password Protection

All official social media accounts are to be:

- **Managed centrally** by the school's Communications/IT Department.
- Protected using **strong, regularly updated passwords** and, where applicable, **multi-factor authentication (MFA)**.

Access credentials must be:

- Shared only with **authorized staff members**.
- Logged and stored securely using an approved password manager.

Immediate action shall be taken to **reset access** if a staff member with credentials leaves the school or changes roles.

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Content, Language & Engagement Guidelines

All content published must:

- Be **educational, informative, and respectful.**
- Maintain a **professional tone**, free from slang, offensive language, or personal opinions.
- Avoid engagement in **arguments, controversial discussions, or political content.**
- Use correct **grammar, spelling**, and adhere to the school's brand tone.

Responses to comments should be:

- **Timely**, polite, and factual.
- Redirected to private messages where sensitive information is involved.

Use of Student Media

- Photos/videos of students will only be posted **with written parental consent.**
- Students will **not be named or tagged** unless explicitly approved and consented.

Moderator Responsibilities

- Moderators will **review and manage all third-party content** (e.g., comments, tags).
- **Immediately remove or report:**
  - Offensive or disrespectful comments
  - Trolling, spam, or false information
- Escalate repeat offenses to the Communications Lead or IT Team.

Handling Misuse & Impersonation

- **Fake accounts or impersonation** must be reported to the platform and the school community alerted.
- Harmful or defamatory content will be documented and may lead to **legal or disciplinary action.**

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2. **Monitoring School Communications:** School regularly monitors all official and unofficial school-related communication channels (newsletters, social media, parent communication groups, etc.) to ensure their compliance with this policy.

3. **Moderators:** School appoint moderator(s) to pre-approve or remove content posted by other users on the schools' social media pages, where possible, in line with the school's guidelines. Moderator(s) shall reject or remove, where possible, content that is inappropriate, not in line with the UAE cultural values, or amounts to bullying, harassment, discrimination, or intimidation, in line with the **ADEK School Values and Ethics Policy** and the **ADEK School Cultural Consideration Policy.**

10.3 Personal Social Media Accounts for Staff: SEPS has authorized members of staff to create and maintain existing personal social media accounts.

In relation to these, staff members shall:

1. Not use email addresses issued by the school to create such accounts.
2. Use the tightest possible privacy settings.
3. Not identify themselves as being associated with the school, except on professional social media platforms (e.g., LinkedIn).
4. Not accept invitations to friend, connect with, or follow from current students or former students under the age of 18, or send such requests to current students or former students under the age of 18.
5. Not accept invitations from parents of current students to friend, connect with, or follow them.

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6. Not use such accounts to communicate with current students, their parents, or former students under the age of 18. This applies to messaging applications (e.g., WhatsApp, Telegram, Signal).

7. Assume that content posted through such accounts (including online reviews and comments) is publicly visible and searchable, regardless of the privacy settings, and exercise appropriate discretion.

8. Ensure that content shared through such accounts is appropriate, in line with the ADEK School Cultural Consideration Policy, and does not amount to bullying, harassment, discrimination, or intimidation, in line with the ADEK School Values and Ethics Policy.

9. Ensure that content shared through such accounts does not give the impression of being endorsed by the school.

10. Ensure that they do not share any confidential information related to the school through such accounts.

10.4 Communications via Email: School will inform staff members that they are not authorized to use personal email addresses to communicate with students or parents.

10.5 School Website: School has a dedicated website and keep it up to date to serve as a reference for members of the school community.

1. School will publish the following content on their website, at a minimum:

a. Contact information.

b. Services provided by the school.

c. Fees, including transportation fees and fees for optional activities.

d. Inspection reports.

e. Aggregate student achievement data or individual achievements with consent.

f. Public versions of the annual report, in line with the ADEK School Reporting Policy.

g. School policies that are relevant to parents and/or students.

h. Any other required content, as defined by ADEK policies.

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2. School will ensure that the content published on their website is accurate and appropriate, in line with the ADEK School Values and Ethics Policy.
3. School will ensure that content published on their website is in line with the requirements for digital media (see Section 9.1. Digital Media Policy)

11. COMPLIANCE

This policy is effective as of the start of the Academic Year 2024/25.

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