

# Data Protection and Confidentiality Policy and Procedure

# Version V1.2

UK College of Business and Computing - Dubai is a branch campus of UK College of Business and Computing Ltd, Registered in England with company number 04294645. Dubai Campus: Dubai International Academic City, Block 10, Second Floor; P.O. Box - 345036 Tel: +971 4 871 5333. Website: www.ukcbc.ac.ae



# **Policy and Procedure**

### 1. Purpose

UK College of Business and Computing (UKCBC) is committed to comply with the Data Protection Act 1998 ("the 1998 Act") and Data protection Law, and the UAE and Dubai Data Law. This policy recognizes in full the rights and obligations inrelation to the management and processing of personal data. This document sets out what the College and its staff must do in practice to meet its data protection obligations for all its members.



#### **2.** Definitions

For the purposes of this document, the following definitions will apply as per Law No. (26) of 2015 Regulating Data Dissemination and Exchange in the Emirate of Dubai.

Data: The Data which is available UKCBC relating to a staff or student . It can be an open data or a shared data

**Data Providers**: A collection of organised or unorganized information, facts, concepts, instructions, observations, or measurements, in the form of numbers, alphabets, symbols, images, or any other form, that are collected, produced, or processed by Data Providers. This also includes "information" wherever mentioned in this Law.

**Electronic Platform**: An electronic or paper-based system which is used by UKCBC to collect, store, manage, process, distribute, disseminate, and exchange UKCBC Data, and which is linked to the Electronic Platform.

**Open Data**: these are data which are exchanged among the different departments of UKCBC for the purpose of easy identification of students and staff

Personal Data – is data that includes information relating to natural people

**Primary registers**: The electronic or paper-based registers, which are determined, organised, and classified by HR for Staff, Student Services and Admission staff to ensure that each register includes a specific and consistent type of UKCBC Data it stores and keeps.

Sensitive personal data – these are data that consists of information about students and employees:

- Racial and ethnic origins
- Political opinions
- Religious beliefs
- Physical or mental health or conditions
- Sexual orientation

**Shared Data**: An electronic system composed of hardware; software; networks; storage systems; and a connectivity and communication site, via which UKCBC uses to disseminate and exchange data.

#### 3. Scope

This policy applies to:

- All students at UKCBC
- UKCBC Assessors /staff
- UKCBC Programme Advisers
- Department Programme Leaders
- Student services
- Stakeholders

The following are affected by this policy:

- All students at UKCBC
- UKCBC Assessors



- UKCBC Programme Advisers
- Department Programme Leaders
- Student services
- Stakeholders

The following must understand this policy:

- All students at UKCBC
- UKCBC Administration
- UKCBC Assessors
- UKCBC Programme Advisers
- Department Programme Leaders
- Student services
- Stakeholders



#### **UKCBC Policy on Data Protection**

UKCBC will:

- 1. fulfil its legal commitments regarding the Data Protection Principles and the retention of personal data of its staff and students
- 2. only collect and retain that information that it needs to carry out is legitimate activities and will hold that information confidentially.
- 3. only obtain and hold "sensitive data", with the express permission of the individuals concerned and will hold that data securely.
- 4. remove from the relevant files and delete or destroy where personal data is no longer required

#### **Employee's responsibilities on Data Protection**

Every employee has a personal responsibility to comply with the requirements of the Act and theCollege policy. It is, therefore, the responsibility of every employee within the terms and to the fullest extent of the Act to protect any personal data that they hold or are responsible for on behalf of the College and to uphold the legal requirements placed on the College for Data Protection.

Any employee who is found to have revealed or disclosed any personal data and sensitive data to any unauthorized person or organization will be in breach of college policy and will be subject to disciplinary action, which may, dependent on the nature of the disclosure be regarded as Gross Misconduct. Such disclosure may also be treated as a criminal offence.

#### Students' responsibilities on Data Protection

Every student has a personal responsibility to comply with the requirements of the Act and the College policy. It is expected that Students will ensure the college is informed of changes to personal information in a timely and accurate way. Students are aware of the use of personal information and agree to the provisions of the Dubai Data Law.



#### 5. Procedure

#### Security

Members of staff are responsible for ensuring that all personal data is held securely and that theydo not permit unauthorized access to, or disclosure of, that data. They will, therefore, ensure that safe keeping of any structured manual files, hard discs, back-up media, removable storage media devices such as USB devices, DVDs, laptops and other items of equipment on or in which data is held and will ensure that screens showing personal data cannot be viewed by unauthorized individuals.

#### **Transfer of Personal Data**

As part of its normal processing of personal data about staff members, students and in certain circumstances, applicants, the College may supply data to Government Agencies, other statutory agencies and a range of other external organizations in order to comply with contractual, statutory or regulatory requirements or in order to protect the rights or safety of the College, its members or others:

- i) Information regarding staff and student records which provide the basis for information required by the Government, and other agencies.
- ii) Information on students' registration, attendance, and academic progress, provided to the Student Loans Company.

Where requests for the reasonable provision of information to external bodies are received by the College which fall outside contractual or statutory requirements, an agreement will be put in place

### 7.References

Title	Link
IT Policy	



## 8. History of Versions

Version Number	Date	Link	Author	Comment or Reason for Modification
V1.1	15/12/2021	Data Protection Policy	SP	
V1. 2	15/12/22	Data Protection Policy	RS	Added points integrating regulatory requirements