



MAMOURA

BRITISH ACADEMY

Records Policy

Policy Issued	Term 2 2024-25
Policy Updated	-
Next Review	Term 2 2025-26
Lead Professional	Principal
SGG Ratification	Term 2 2024-25

Rationale

The purpose of this policy is to ensure that clear, full, accurate, and up-to-date records are in place at Mamoura British Academy to ensure we discharge our functions effectively. In creating, processing and storing records that include personal data, MBA will comply with laws in the UAE regarding data protection and Aldar Education guidance.

Policy References

This policy is written in conjunction with:

- ADEK Records Policy 2024-25
- ADEK School Digital Policy 2024-25
- Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data
- ADEK School Safeguarding Policy 2024-25
- ADEK School Digital Policy 2024-25
- ADEK School Student Administrative Affairs Policy 2024-25
- ADEK School Inclusion Policy 2024-25
- ADEK School Financial Audit and Reports Policy 2024-25
- Financial Law No. 1 of 2017 for the Abu Dhabi Emirate
- Aldar Group Technology – Information Security Policy Manual

Records

Mamoura British Academy are committed to maintaining clear, accurate, up-to-date, and sufficiently detailed records to effectively manage administration, operations, student affairs, and governance.

The policy includes the following:

- Types of records maintained
- Rationale for data collection and storage of records
- Resources used for record management
- Modes of storage for different types of records
- Roles and responsibilities of staff, including details on staff authorized to create, access, maintain, and dispose of different types of records.
- Data protection plan
- Record preservation schedule
- Record disposal procedures
- Student record transfer procedures
- Record preservation and transfer in the event of school closure

Data Privacy and Protection

School Data Protection Plan: MBA is committed to developing and implementing a **data protection plan** (Appendix 1) in compliance with the Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data and the ADEK School Digital Policy and includes the following minimum requirements:

1. Mechanisms for classifying documents for authorized access, use, and disposal based on defined data sensitivity standards (e.g., full access, limited access, or no access) for various stakeholders – **Email to Andy**
2. Mechanisms for identifying, reporting, and handling security breaches, in line with the ADEK School Safeguarding Policy – **Email to Sara**
3. Procedures for implementing and monitoring compliance with the data protection plan

Digital Incidents: MBA shall ensure that every digital incident is recorded, documented, and signed by the Principal, and stored for auditing purposes.

Storage and Disposal of School Records: MBA will develop and implement mechanisms for secure, environmentally sustainable, and safe storage and disposal of school records, in line with the ADEK School Digital Policy and the ADEK School Sustainability Policy.

- **Storage of Records:** MBA has storage mechanisms that are secure, safe, accessible only to authorized staff, and provide appropriate environmental conditions for the preservation of records (in hard or soft copy). Almost all storage mechanisms are digital and paper records are only kept where mandatory
 - MBA will abide by minimum and maximum durations of storage of various records, in line with ADEK requirements, which is outlined in the Record Preservation Schedule (Appendix 2)
- **Disposal of Records:** MBA will dispose of records, as per the timelines in the Record Preservation Schedule (Appendix 2) using authorized personnel.
 - MBA will outline and adhere to disposal guidelines for each type of document as classified for authorized access, in line with policies set by ADEK and the relevant authorities in the UAE in their areas of jurisdiction
 - MBA shall maintain proof of evidence of destruction of records and implement regular data clean-ups. These will be held with each function responsible for record disposal

Student School Transfer: When students transfer schools within or outside the UAE, MBA shall efficiently transfer and ensure receipt, as appropriate, of key student information records on academic progress and achievement, transfer certificates, and other documents in response to requests from the student's parent(s) as per the ADEK School Student Administrative Affairs Policy. MBA will obtain the parent's permission before transferring student information to any third party.

School Closure: In the event of a school closure, MBA will provide ADEK with a clear plan regarding the preservation or transfer of records, in line with ADEK policies.

Types of Records

Student Records: MBA will maintain up-to-date detailed records of student information. These records will be kept with the following information, at a minimum:

1. Personal information (name, date of birth, gender, nationality, parent information, address, contact Information)
2. Attendance
3. Academic progress and achievement
4. Extracurricular participation and achievement
5. Behavioral incidents
6. Documented learning plans (DLPs), especially for students with additional learning needs, in line with the ADEK School Inclusion Policy
7. Cases on student protection
8. Medical information
9. A copy of any reports on student information submitted to ADEK, parents, and any other stakeholders.

These records are held digitally on the schools MIS system (ISAMS/Sales Force), Learning Ladders and CPOMS.

Student Medical Records: MBA maintain detailed, up-to-date, secure, and confidential individual student records on medical information, in line with the requirements of the Department of Health (DoH), in particular, the *School Screening Standard* (DoH, 2023).

1. School nurses will create a record for new students enrolled From Nursery to Year 2 and for transfer students from other schools that do not provide school health services (e.g. students transferring from a school outside the UAE)
2. MBA will allow parents to access their child's records upon request. However, these will not be photocopied or removed from the school clinic
3. MBA will procure the necessary approval from DoH and parents and notify ADEK to release student medical records for any external requests
4. MBA will ensure that PE teachers have access to students' medical records in order to be aware of individual students' medical conditions which can impact sports and to be able to address any incidents that may occur.

Student medical records at MBA are stored within the "Medical Centre" module on ISAMS and on CPOMS to records students visits to the clinic.

MBA will preserve ALL student records (enrollment, academic achievements, daily attendance, and other disciplinary records) for at least 5 years after the student leaves the school, in electronic archives on the school MIS system.

Graduation Records: MBA shall maintain student graduation records indefinitely. At MBA this information is located on ISAMS. The records should include:

1. Personal Information
2. Academic Information
 - a. Academic achievements inc. Grades and courses completed
 - b. Date of graduation
 - c. Any distinctions or honors received on graduation
3. Attendance Records
4. Extra-Curricular Activities
5. Behaviour records
6. Documented Learning Plans (If available)
7. Medical Information (If applicable)

Staff Records: MBA maintain up-to-date and detailed staff records. The following minimum information is kept, in a confidential manner with limited access to necessary personnel:

1. Personal information (identity, address, contact, medical information)
2. Employment information (including current and past employment, education, qualifications, current employment terms, salary, benefits, and other contractual details)
3. Educational and professional information (including teaching activities, continuous professional development, attendance and leaves, non-anonymous staff survey outcomes, and performance management).
4. Professional conduct information (including serious incidents, and complaints and investigation reports).
5. A copy of any reports on staff information submitted by the school to ADEK, parents, and any other stakeholders.

Staff records are stored on Bluesky, Oracle & Aldar EDMS MBA will store staff records for at least 5 years and at most 7 years following the end of the staff member's employment.

However, these may be kept for an additional period if deemed beneficial for school operations. – Emailed Nive TBC

Financial Records: MBA will maintain accurate, up-to-date, and comprehensive records on school financials with access to school owners, the governing board, the Principal, and ADEK upon request. Financial records will be kept in accordance with the ADEK School Financial Audit and Reports Policy.

- MBA will record a copy of any reports on financial information shared with ADEK, parents, and any other stakeholders.

MBA will preserve all financial records in accordance with Financial Law No. 1 of 2017 for the Abu Dhabi Emirate and its amendments. All financial records are stored on Oracle Fusion.

Administrative Records: MBA will maintain up-to-date, relevant, accurate, and comprehensive records on school administrative functions. These records include the following minimum information and can be found in the following locations:

Record Type	Storage Location
Property, infrastructure, and facilities management	<ul style="list-style-type: none"> • Operations Teams
Human resource management	<ul style="list-style-type: none"> • Aldar EDMS
Finance management	<ul style="list-style-type: none"> • Oracle Fusion
Information systems and management	<ul style="list-style-type: none"> • ISAMS • Evotix • Proxy click
Management committees and other school activities	<ul style="list-style-type: none"> • ELT Teams Area • PLT/MSLT Teams Area • SGG Teams Area
School inspection-related documents like self-evaluation forms	<ul style="list-style-type: none"> • School Improvement Teams Area • MBA Inspection Teams Area
Day-to-day activities such as a log of visitors to school premises, information on parents who wish to enrol their children	<ul style="list-style-type: none"> • Proxyclick • Salesforce
Legal activities and contracts	<ul style="list-style-type: none"> • Operations Team • SAP Arabia • Aldar Legal
A copy of any reports on administrative information shared with ADEK, parents, and any other stakeholders	

MBA will preserve school administrative records for at least 5 years.

Governance Records: MBA will maintain up-to-date, accurate, and comprehensive governance records for the Academy's Strategic Governance Group (SGG). These will include the following minimum information:

1. School-level governance policies
2. Agendas and minutes of meetings
3. Details and correspondence on board elections
4. School Development Plans
5. Annual reports

6. Policies and guides developed by the school (e.g., emergency procedures, school rules, etc.)
7. A copy of any reports on governance information shared with ADEK, parents, and any other stakeholders

MBA will store all such records on the MBA SGG Teams Area and will preserve school governance records for at least 5 years.

Review

This policy is to be reviewed annually or at any time required when ADEK or Aldar Education policy is updated.

APPENDIX 1 – Data Protection Plan

Introduction:

The purpose of this plan is to provide an overview of how we protect data at MBA and our adherence to legal requirements.

Area of Focus	Actions
Document Classification	Procedures to categorize documents based on sensitivity and access levels. – Andy Turner
Security Breach Protocol	Steps for reporting and managing data breaches, including notification timelines - Refer to Aldar Group Technology – Information Security Policy Manual.
Compliance Monitoring	Regular audits to assess adherence to the data protection plan and related policies – Undertaken by HQ on an annual basis
Staff Data Protection Training	MBA will undertake the following staff training: <ul style="list-style-type: none"> • Data Privacy • Data Protection Practices • Data Security This training will be undertaken annually and a register will be signed to confirm attendance and adherence to the policy
Annual Review	<ul style="list-style-type: none"> • The data protection plan will be revised on an annual basis • The plan will be reviewed by all lead functions to ensure practices for their departments remain relevant, are effective and complies with Legal, ADEK and Aldar policies • Any adaptations to the policy will be actioned by lead functions and then ratified by the SGG group

APPENDIX 2 – Record Preservation Schedule

Type of Record	Where stored	Duration of Storage	Disposal Procedure	Who Responsible	Review
Student	<ul style="list-style-type: none"> ESIS Salesforce ISAMS Learning Ladders CPOMS Teams 	5 years	Secure shredding and/or electronic destruction protocols followed	Registrar AP's Assessment AP's Pastoral ECA Lead Director of Incl. OSM	Annual
Graduation	<ul style="list-style-type: none"> ISAMS ESIS Admissions Teams CPOMS 	Indefinitely	N/A	Registrar AP Assessment	N/A
Staff	<ul style="list-style-type: none"> EDMS – Aldar internal platform Oracle Bluesky 	5-7 years after termination or indefinite – if so rationale needed	Secure shredding and/or electronic destruction protocols followed	HRO	Annual
Governance	<ul style="list-style-type: none"> MBA SGG Teams Area 	5 years	Any records over 5 years permeant deleted on Teams	Principal	Annual
Finance	<ul style="list-style-type: none"> Oracle Fusion 	5 years	Secure shredding and/or electronic destruction protocols followed	Accountant	Annual
Administrative	<ul style="list-style-type: none"> 	5 years	Secure shredding and/or electronic destruction protocols followed	HRO Accountant OSM Principal Legal?	Annual