



DATA PROTECTION & RESPONSIBLE USE OF TECHNOLOGY POLICY

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1.Introduction

At Small Steps Learning Difficulties Center, we are committed to safeguarding the privacy and security of all personal data entrusted to us by students, parents, staff, and affiliated stakeholders. In our role as a specialized center supporting children with developmental and learning differences, we recognize the highly sensitive nature of the information we process and the obligation to protect it with the utmost care. This policy outlines the principles, procedures, and safeguards that guide our approach to data protection in compliance with the UAE Federal Decree Law No. 45 of 2021 on the Protection of Personal Data (PDPL) and global best practices such as the EU General Data Protection Regulation (GDPR). Our approach to data protection is grounded in the principles of confidentiality, integrity, and availability of information.

Definitions:

- Personal Data: Refers to any information relating to an identified or identifiable individual.
- Processing: Encompasses any operation performed on personal data, including its collection, storage, use, and sharing.
- Children: Refers to the individuals whose personal data is being recorded.

Data Collection:

At Small Steps, we adhere to strict guidelines for the collection of personal data, ensuring it is done only for specified, explicit, and legitimate purposes. The types of personal data we may collect include:

- Contact details (such as name, address, phone number, email)
- Medical and health information
- Educational records
- Behavioural assessments
- Program Specific goals and Objectives
- Emergency contact information

2.Purpose of Policy

The purpose of this policy is to provide a clear framework for the lawful and secure collection, processing, storage, sharing, and retention of personal data. It establishes the responsibilities of Small Steps and its employees in managing personal and sensitive information in a manner that protects the rights of data subjects and complies with all relevant legal and regulatory requirements. Additionally, the policy ensures that our internal systems and software applications are used responsibly and securely in accordance with defined data privacy standards.

3. Scope

This policy applies to all individuals working for or on behalf of Small Steps, including full-time and part-time employees, paraprofessionals, volunteers, interns, third-party contractors, and external service providers. It covers all personal and sensitive data processed by Small Steps, whether collected through electronic platforms or in paper-based formats. The policy also governs the use of platforms such as Hirasmus, Slack, OneDrive, Microsoft Co-Pilot, Redrock Training, CURA, Ai Platforms and Photo Circle, which are utilized for internal communication, clinical documentation, educational programming, and media sharing.

4. Legal and Regulatory Framework

Our data protection practices are governed by the UAE Federal Decree Law No. 45 of 2021 (PDPL), which outlines requirements for lawful data processing, data subject rights, and organizational accountability. In addition, we align our practices with the principles of the General Data Protection Regulation (GDPR) to ensure international compatibility, especially in our dealings with multinational stakeholders and certifying organizations. We also follow directives issued by the UAE Telecommunications and Digital Government Regulatory Authority (TDRA) concerning cybersecurity and digital communication.

5. Policy Components and Implementation

5.1 Data Collection:

At Small Steps, we prioritize the secure and responsible collection of personal data. Our policy ensures that data collection is conducted for specified, explicit, and legitimate purposes, using the following applications and tools:

- **Hirasmus:** Utilized for program data collection. All data entered into Hirasmus must be accurate and relevant. To protect privacy, avoid using full names where possible and use initials or unique identifiers instead.
- **Slack:** Employed for internal communication. Personal information should only be shared in private channels or direct messages on Slack, avoiding public channels.
- **MS Co-pilot and MS Sharepoint:** Used for secure file storage and management to safeguard personal data.
- **Redrock Training:** Utilized for internal staff training and Continuing Education Units (CEUs), ensuring staff competence and compliance with data protection protocols.
- **CURA:** Employed as safeguarding software to uphold the safety and well-being of our students, integrating data protection measures.
- **Photo Circle:** Employed for sharing videos and photos within our internal network and with parents. It is crucial to ensure that images and videos do not include students without explicit consent. Blur out or avoid capturing images of students who have not consented to media sharing to protect their privacy.
- **Breathe HR** is a secure HR management platform to store and manage employee information, including personal, employment, attendance, and leave records.
- **Access to Breathe HR** is restricted to authorized personnel based on their job responsibilities and is managed in accordance with applicable data protection and confidentiality requirements. Employee information will only be accessed, processed, and retained for legitimate HR, administrative, legal, and operational purposes.

5.2 Data Sharing and Storage:

- **Secured Network:** Ensure that all data shared online is done through secure, encrypted networks. Avoid using unsecured public Wi-Fi for accessing or sharing personal data.
- **Avoid Public Platforms:** Photos, or videos of students on public platforms or Small Steps social media should be used only after securing a written consent from parents/guardian which should be updated annually. Internal media sharing should be confined to Photo Circle or other approved secure applications, and access should only be provided to authorized individuals or clinical staff members.

- **Data Minimization:** Only collect and share the minimum amount of personal data necessary for the intended purpose.

5.3 Consent and Privacy:

Consent is a foundational requirement in our data processing procedures. We ensure that informed, explicit, and written consent is obtained from parents or guardians before collecting or using any personal or sensitive information. Consent is also obtained prior to taking or sharing photographs, videos, or any identifiable media of students. All consent forms are retained securely and updated annually or upon changes in circumstances. Where feasible, data is anonymized or pseudonymized to protect identity.

5.4 Data Security Measures:

To ensure the safety of personal data, Small Steps employs advanced technical and organizational measures. These include encryption of sensitive data, multi-factor authentication, secure file management, and firewall-protected networks. All staff accounts are protected with strong passwords, which must be updated regularly. Devices used for accessing sensitive data must be compliant with our security protocols. Staff are required to lock screens and avoid leaving physical documents in open areas. Data backups are conducted regularly, and disaster recovery plans are in place to mitigate potential data loss.

5.5 Incident Response:

In the event of a data breach or suspected data incident, staff must immediately report the issue to Mr. Valmiro Fernandes, the designated Data Protection Officer. A formal investigation will be initiated within 24 hours, and containment and recovery measures will be implemented. Affected parties will be notified in compliance with UAE PDPL and other relevant legal obligations. A breach of log will be maintained for accountability and future risk mitigation.

6. Records Retention and Disposal

Data is retained only for the duration necessary to fulfill its intended purpose or to comply with legal obligations. Student data is retained for at least seven years following withdrawal, unless otherwise required by UAE regulations. Confidential records are disposed of securely either through digital deletion from all storage systems or physical shredding of hard copies.

7. Staff Responsibilities and Training

All employees, contractors, and affiliated professionals at Small Steps must complete mandatory training in data protection upon onboarding and annually thereafter. They are required to sign confidentiality agreements and are held accountable for any misuse or negligence regarding data handling. The Head of Operations, who acts as the Data Protection Officer (DPO), is responsible for ensuring organizational compliance and liaising with regulators when needed.

8. Responsible Use of Technology

At Small Steps Learning Difficulties Center, all staff, therapists, educators, and affiliated service providers are expected to use technology in a professional, secure, and responsible manner. Technology should be used solely for purposes aligned with the center's mission, student care, and organizational goals. The use

of digital tools must comply with data protection standards and should never compromise the safety, dignity, or privacy of any student, staff member, or parent.

All digital communication and data access must occur via approved platforms such as Hirasumus, Microsoft OneDrive, Slack, and other designated systems. Personal devices used to access student records or internal communication tools must be password-protected, encrypted (where applicable), and never shared. Use of unsecured public Wi-Fi, file-sharing apps, or personal email accounts to transmit or store sensitive information is strictly prohibited. Staff are strictly forbidden from downloading unauthorized software or accessing inappropriate content using any device or network affiliated with the center. Misuse of technology, including attempts to bypass firewalls or security protocols, will result in disciplinary actions and potential legal consequences under UAE Cybercrime Law No. 5 of 2012.

Use of images, video, or audio recordings of students must always be pre-approved with documented parental consent and must remain within the designated secure applications, such as Photo Circle. Under no circumstances should staff or therapists post student-related content on social media or personal digital spaces.

The Head of Operations, in consultation with the IT support, is responsible for monitoring compliance, conducting regular digital audits, and updating security protocols. Ongoing training and refresher sessions will be provided to ensure that all staff are well-versed in the secure and ethical use of technology.

9. Review and Monitoring

This policy will be reviewed annually by the Small Steps Senior Leadership Team and updated as necessary to ensure ongoing compliance with data protection laws and best practices. Small Steps will regularly monitor compliance with this policy through audits, staff training, and feedback from the Small Steps community.

By adhering to this Data Protection Policy, Small Steps aims to promote a culture of data privacy and security, ensuring that the personal information of our students, staff, and parents is always safeguarded.

Related Policies and Documents

This policy should be read in conjunction with other organizational policies that impact data protection and security, including:

- Safeguarding Policy
- Social Media Policy
- Staff Confidentiality Agreement

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