



Policy Name: Personal Data Protection Policy

Policy number: DCSG-PM-COM- 08	Version number: 04	
Developed by: Compliance	Approved by: Director of Business Administration & Bursar	Approval Date: 28 September 2023
Date last reviewed: 28 September 2023	Reviewed by: Director of Business Administration & Bursar Compliance	Date of next review: 28 September 2025
Policy Location: College Website - https://singapore.dulwich.org/our-college/governance Staff – https://dcs.fireflycloud.asia/college-policies/management/personal-data-protection-policy Parent - https://dcs.fireflycloud.asia/school-information/college-policies-and-parent-code-of-conduct/whole-college-policies/personal-data-protection-policy-		

1. Purpose of Policy

Dulwich College (Singapore) (the “College”) respects the privacy of its students, parents, staff, community members and visitors to the College campus. This Personal Data Protection Policy sets out the basis on which the College may collect, use, disclose or otherwise process personal data of its students in accordance with the Personal Data Protection Act 2012 (“PDPA”).

2. Scope

This Personal Data Protection Policy applies to personal data in the College’s possession or under its control, including personal data in the possession of organisations which the College has engaged to collect, use, disclose or process personal data for its purposes.

3. Policy Details

In order for the College to deliver quality education and to run activities that will promote the College’s ethos and philosophy, and further enhance the College’s interaction with the local as well as international community, the College will need to collect certain personal data but will do so in compliance with the PDPA. Staff of the College are committed to maintain the

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confidentiality of all student and their parent/legal guardian's personal information and are not to divulge any personal information to any third party without the prior written consent (where applicable) of the student's parent/legal guardian.

The Compliance Manager and Director of Business Administration and Bursar will review the policy and processes for data protection once every two years or as and when necessary for continual improvement.

4. Implementation Details

A. Personal Data Under the PDPA and "Processing" Of Personal Data

The PDPA will apply to all personal data. Personal data is defined under the PDPA as:

"...data whether true or not, about an individual who can be identified

(a) from that data, or

(b) from that data and other information to which the organisation has or is likely to have access"

Generally, the types of personal data that the College handles include, for example (non-exhaustive):

- (a) Information of students (including alumni) including names, addresses, identification numbers, contact numbers, subjects taken, examination results, progress information of students, personal information in forms completed, extra-curricular activities records, counselling records, medical information;
- (b) Information of students' parents/guardians including names, addresses, identification numbers, details of their children, educational level, job details, financial information;
- (c) photographs and videos of individuals;
- (d) CCTV footage containing images and videos of individuals;
- (e) Personal details collected by security personnel, e.g. names and contact numbers.

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B. Purpose of Collection, Use and Disclosure of Data

The College will collect, use and disclose personal data before, during or after a student's enrolment with the College, relating to the parents/guardians and the student including those personal data set out in the Student Contract and personal data provided in or along with the application form and such other personal data collected from time to time. The foregoing personal data are required to be collected and used solely for purposes of College operations and activities that directly advance the educational and developmental potential of the student insofar as these are clearly within the curriculum for which the student is enrolled (whether relating to academic, cocurricular, cultural or sporting activities held in Singapore or elsewhere, and whether in conjunction with or organised by other Dulwich Colleges, affiliates of any Dulwich College, or other schools whether located in or outside of Singapore). This would include the disclosure of student academic records and references to the next education institution for the furtherance of the student's studies.

Personal data including photographs and videos relating to parents/guardians as well as the students are also required for the purposes of the College operations and activities consistent with the ethos and philosophy of the College. The College's operations and activities may include the usage of the foregoing personal data for the purposes of academic public communication through the College's communication channels and management to inform on the intended curriculum or the school's academic, co-curricular, cultural and sporting events. The College will also require the foregoing personal data to facilitate communication for administration purposes. True to the College's vision, that is to inspire students to seize the possibilities of tomorrow through a family of the world's greatest schools, the College may use the personal data of the students to celebrate academic achievements, sporting and performing arts prowess and other co-curricular achievements subject to safeguarding protections. Parents/guardians who would not like their child to appear in any or all of the above-mentioned communication channels must notify the College in writing at the time of the student application.

Personal data may also be collected from members of the public in order to address queries relating to the College's educational offering, to allow members of the public to participate in the educational events and talks organised by the College, or co-curricular, cultural and sporting events, or maintain communication with members of the public who are interested to follow the news of the College.

Visitors to the College's office or campus would also be required to register certain personal data as part of the College's security measures and safeguarding obligations to ensure a safe and secure environment.

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Where traditional log books are used, for example at security counters, the College should ensure that that only the staff of the College can see the entries in the log book and not any visitor. The staff of the College would in this regard need to be the one to write in required personal data of the visitor and not allow the visitor themselves to write it in. The College should also ensure that the abovementioned traditional log book is kept secure and only accessible by staff of the College on a need to know basis.

The College is a member of Dulwich College International (DCI), a family of schools whose mission is to create 'One Family of Schools' with campus locations spanning across many cities in Asia and in the UK. Members of the DCI family share best practices in teaching and learning, as well as organize inter-campus events and activities that serve to enhance the educational as well as cocurricular offering of the College. In order to facilitate these exchanges, the College will be required to disclose personal data to members of the DCI family.

In the course of running the College, the College will need to share personal data with third parties, including but not limited to the following:

- Bus and catering companies
- Examination boards
- Organizers for external trips

There may be circumstances under which the College will be required by law, government authorities or the courts to disclose personal data and the College may do so without first obtaining the individual's consent.

This Personal Data Protection Policy supplements but does not supersede nor does it replace any consent given to the College in relation to the collection, disclosure and use of personal data.

C. Do not Consent Register

The 'Do Not Consent' Register contains the list of families who have chosen not to sign the 'consent for student photographs' clause of the Student Contract. The College is not permitted to feature any students on the list, on any internal or external channels of communications; including social media, advertisements and on the College Website.

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D. Withdrawal of Consent

Where the College has obtained specific consent from an individual to process personal data for a particular purpose, that individual may withdraw consent at any time upon giving reasonable notice.

E. Data Accuracy and Security

The College will endeavour to ensure that all personal data collected by it or on its behalf is as accurate as possible. Individuals should notify the College of any significant changes to important information, such as contact details, held about them. The College will take appropriate security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. Staff will be made aware of their duties under the PDPA and receive relevant training.

F. Enquiries

The College may from time to time update this Personal Data Protection Policy in line with legal and practice developments. The College will publish up-to-date Personal Data Protection Policy on its website.

The College is committed to protecting students and their parents/guardians' personal data and maintaining a transparent process on its policies and procedures.

If any individual has any questions regarding the College's Personal Data Protection Policy, or would like to access or make corrections to their personal data records, or withdraw their consent to the College's use of their personal data, please contact the College's Data Protection Officer:

Email: DCSG_DPO@dulwich.org

Address: Data Protection Officer
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5. Other related policies and procedures

Documents related to this policy	
Related policies	EIM Data Protection Policy
Forms or other organisational documents	Do Not Consent Register

6. Review processes

Policy review frequency: Once every two years or as and when necessary for continual improvement	Responsibility for review: Compliance / Director of Business Administration & Bursar
Review process: i) Compliance / Director of Business Administration & Bursar to conduct review of policy. ii) Modification will be made where appropriate. iii) Submit for review and approval by the DBA.	

7. Approval Details

Approved by: Paola Morris

28 September 2023

 Signature and Date
Signed only required in hardcopy

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8. Revision History

Revision Table:		
Date	Version	Review Description
13 June 2019	1	Initial Release
20 August 2019	2	<p>Revised formatting style</p> <p>Amended Policy name from 'Data Protection Policy' to 'Personal Data Protection Policy'</p> <p>Added section 3. Policy Details.</p> <p>Added Section A - Personal Data Under the PDPA and "Processing" Of Personal Data</p> <p>Added 'The Director of Business Administration and Bursar will review the policy and processes for data protection annually or as and when necessary for continual improvement. '</p> <p>Added 'Staff of the College are committed to maintain the confidentiality of all Student and Staff personal information and are not to divulge any Student and Staff personal information to any third party without the prior written consent of the Student / Staff.'</p> <p>Added Section on Do not Consent Register, Withdrawal of Consent and Data Accuracy and Security</p>
03 August 2021	3	<p>Revision of email address of the Data Protection Officer</p> <p>Updated New Policy Template</p> <p>Updated Policy Number</p>
28 September 2023	4	<p>Updated New Policy Template</p> <p>Review of content to ensure up to date.</p> <p>Added EIM Data Protection Policy as a related policy</p>

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