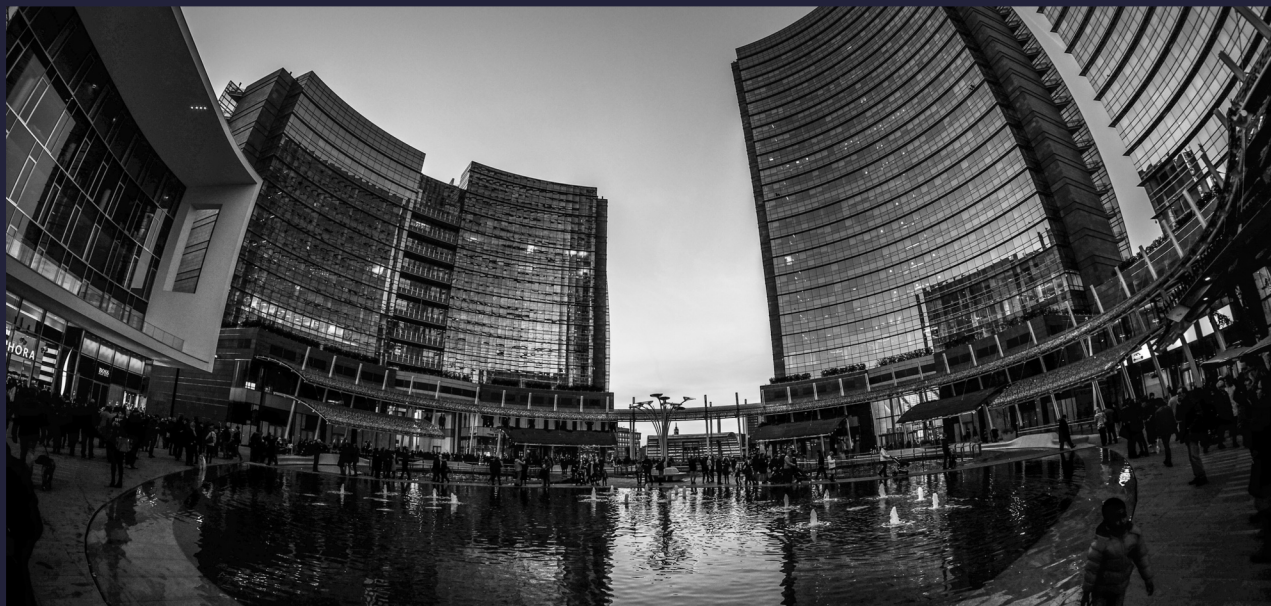




**DPDPA**  
FOR SCHOOLS



# COMPLIANCE TOOLKIT

# 2025

Authors

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# Author's Message



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As schools increasingly rely on digital systems, protecting student data is no longer optional – **it's essential.**

This toolkit simplifies the DPDPA for schools, helping you understand how important it is to manage photos, academic records, parent details, and more – with consent, clarity, and care.



We conducted a survey amongst more than **100 school owners & principals**, shocking results came across, where only 15% of them knew about the DPDPA, its brand implications and monetary penalties applicable to the school

## INR 200 CR

Schools face a penalty of upto INR 200 Crore in case of any Breach of children's Data Obligations

## INR 250 CR

Schools face a penalty of upto INR 250 Crore in case of Failure to prevent a Data Breach

Source : [DPDP ACT, 2023](#)

# KEY PROVISIONS



## ● Section 2(f), 2(j)(i)

### Definition of a Child & Guardian Consent:

- A child is anyone under 18 years of age.
- A Data Principal for a child includes their parent or lawful guardian.

### Why It Matters for Schools:

All photos/videos showing students under 18 must be treated as personal data of the parent. Consent must be obtained from the parent, not the child.

## ● Section 4

### Grounds for Processing

Personal data may be processed only if:

- (a) Consent has been given by the parent/guardian, or
- (b) It is for certain legitimate uses (see Section 7)

### School Illustration:

You cannot publish a student's Annual Day photo on Facebook/Google Drive/WhatsApp unless you've collected explicit, prior parental consent for media sharing.

## ● Section 6

### Consent Requirements

Consent must be:

- Free, Specific, Informed, Unambiguous
- Provided with affirmative action
- Revocable anytime with the same ease as given

### School Illustration:

If a parent opts out of photo use in school galleries after consenting earlier, the school must stop using and displaying the photos, including on alumni boards or brochures.





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## ● Section 5 (1)

### **Mandatory Notice**

The school (Data Fiduciary) must inform the parent (Data Principal):

- What data will be used (e.g., child's image)
- Why it is being collected (e.g., gallery, newsletter)
- How they can withdraw consent or file a complaint

### **School Illustration:**

Your student event registration form must include a media use clause with clear opt-in/out buttons and explain where the content will be shown.

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## ● Section 7 (a)

### **Voluntary Disclosure**

If a parent voluntarily provides a photo/video, and does not object to its use, it may be processed only for the specified purpose.

### **School Illustration:**

If a parent uploads a photo to a school memory wall, the school can only use it on that platform, not reuse it in marketing or ads.

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## ● Section 9 (Most Critical)

### **Processing Data of Children**

- You must obtain verifiable parental consent before using any student's personal data
- You cannot process data if it is likely to harm the well-being of a child
- No tracking, behavioural profiling, or targeted advertising

### **School Illustration:**

Uploading a student's sports day video to YouTube with open comments or ads enabled could violate this section.

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## ● Section 8 (7)

### **Right to Erasure**

Once the child leaves school or the purpose is over, the school must erase that data, unless law requires retention.

#### **School Illustration:**

A school cannot indefinitely keep and display farewell photos of students unless a) required by law, or b) they have ongoing valid consent.

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## ● Section 12,13

### **Right to Erasure & Grievance Redressal**

Parents can request:

- Access to all data being used
- Correction or deletion of data
- Raise complaints if the school misuses data or fails to respond

#### **School Illustration:**

A parent demands deletion of her child's image from a group photo on the website. The school must comply and provide a redressal contact.

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## ● Section 8(5)

### **Reasonable Security Safeguards**

The school must:

- Protect all data (photos/videos included) from breach or misuse
- Ensure vendors (photographers, ERPs) do the same

#### **School Illustration:**

If the photographer uploads unprotected images on Google Drive and shares the folder with all parents – the school is liable unless covered under contract and controlled.

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# Types of School Data covered under DPDPA



## ● VISUAL MEDIA

- Photos, videos, event recordings
- CCTV footage (if stored digitally)
- Yearbook and website images

## ● IDENTITY & DEMOGRAPHICS

- Student names, parent names
- Date of birth, gender, religion, caste, etc.
- Aadhaar, PAN, student ID numbers

## ● CONTACT & LOCATION

- Mobile numbers, email IDs
- Home address, GPS data from school transport apps

## ● ACADEMIC & BEHAVIOURAL DATA

- Exam scores, report cards
- Disciplinary records, class participation notes
- Health records maintained by the school nurse/counsellor

## ● DIGITAL INTERACTIONS

- Online class recordings and chat logs
- Activity on school apps, portals, ERPs
- Biometric logins (e.g. face/fingerprint attendance)



# SUMMARY

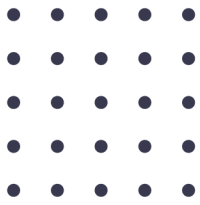


Requirement	Section	School Implication
Verifiable parental consent	Sec 9(1)	Mandatory before photo/video use
No harmful data processing	Sec 9(2)	Cannot post shaming videos or risky content
Consent must be revocable	Sec 6(4–6)	Parent can withdraw anytime
Notices before consent	Sec 5	Must disclose use clearly (newsletter, social, etc.)
Right to erasure	Sec 12	Must delete photos upon parent request
Penalties for misuse	Schedule	Up to INR 200–250 Cr for violations

## IMPLICATIONS FOR SCHOOLS

Risk Area	DPDPA Mandate
Sharing student results or photos without consent	✔ Requires verifiable parental consent (Sec 9)
Storing unnecessary old data after transfer	✘ Must erase data once purpose is over (Sec 8(7))
Sending bulk student info to vendors (e.g., photographers, publishers)	✔ Must have contracts + safeguards in place (Sec 8(2))
Using student data for marketing (e.g. newsletter, social media, test prep partners)	✘ Not allowed without clear purpose & consent





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# Thank You

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