



EFFECTIVE: 4 FEBRUARY 2023

REVIEWED: 30 MAY 2024

DATA MANAGEMENT POLICY

1. DATA PROTECTION PRINCIPLES

In accordance with the POPI Act of South Africa the school recognizes the importance of maintaining the privacy of staff, pupil and family records and information (identifiable natural or juristic person) and endeavors to follow the principles set forth by the Protection of Personal Information Policy.

RECORDS AND INFORMATION CAPTURED

1. Books are regarded confidential records which are kept out of direct sight of parents and pupils. They are safely stored when the teacher is out of her classroom.
2. Application forms and contract of enrolments as well as all personal information are stored safely in the in the cloud, **Google Classroom** (password protected).
3. Only hardcopy application forms pertaining to **Swim & HopHouse** enrolments will be kept in a file, securely locked away at reception.
4. Reply slips (indemnities and disclaimers) specifically for excursions, tournaments etc. will be kept for one term and then discarded of.
5. Only an **Emergency File** is accessible in the reception drawer for when contacting parents in an emergency, this file will contain the student's medical aid number, allergies, medical information and emergency contact details, furthermore on admission each student is asked to complete a **Student Profile** form, pertaining only information necessary for the teachers purpose, kept in the students portfolio in their register class.
6. **Confidential Learner Profiles** (updated biannually or when the student leaves) are stored in the cloud (password protected).
7. No telephone numbers, email addresses or any other personal information of teachers, parents or pupils may be given to a third party under any circumstances. Should a parent request a telephone number of another parent or a teacher, the Principal will first and foremost get permission before sharing.
8. Records of past students are kept for a period of 5 years (except Grade 12 records), thereafter all expired personal records and confidential information will be destroyed and not recycled. Shredding takes place weekly.
9. Teacher's personal telephone numbers may not be given to parents.
10. Class lists are not printed or supplied for public scrutiny or parental party planning; these are confidential records.
11. Once read, all psychology, therapy and remedial specialist reports pertaining to pupils are stored under their personal profiles on the cloud.
12. Academic, behavioural and absenteeism records are saved on **d6, CEMIS** (password protected) and securely in the **Teachers Subject Portfolio**.
13. All assessments (formal & informal) are filed and kept in each child's personal **Student Portfolio File**.
14. Each class also has a **Class Journal** recording daily incidents and injuries, this information is transferred to their personal **Student Portfolios** regularly.
15. Minutes of meetings are sent to the principal email once completed by the relevant teachers and HOD's and then saved on the cloud (password protected).
16. **Staff Profiles** (containing performance appraisals, contracts and staff personal information) are stored on the cloud (password protected).
17. The teacher reserves the right to either give the learner's workbook back to the learner at the end of a school year, or to retain the workbooks. It is encouraged that workbooks are returned to pupils and any assessment activities that are to remain confidential be removed from the workbooks prior to the child taking them home.

2. MANAGEMENT REVIEW PROCEDURES

2.1. ANALYSIS OR ACTION TAKEN IN THE BELOW INSTANCES:

2.1.1. The school begins utilizing new administration systems, software or technology that make use of personal information.

2.1.2. Processing large amounts of special information (high risk)

2.1.3. Any incident where a data breach seems to have occurred and data subjects will be informed if their data has been lost, destroyed, or otherwise mishandled, following internal investigation procedures.

3. RETENTION PERIOD FOR PERSONAL INFORMATION

3.1. Staff data is retained for 5 years.

3.2. Student, parent/guardian, next of kin, and designated emergency information is retained for 5 years.

3.3. Personal Information may be retained longer if the school is required to do so (SARS).

3.4. Student assessments are retained for 3 months after the end of the current year. If no parent queries have been made as to the mark, assessments are destroyed.

4. HOW IS YOUR DATA COLLECTED?

- Via application forms (on paper or the school's website)
- Via contract of enrolment (on paper or electronically)
- Via indemnity forms (on paper or electronically)
- Via School Policies (on paper, school website, electronically)
- Via newsletters, fundraisers participation, excursions/tours, extra murals (on paper or electronically)
- Via Personal Information update forms (on paper or electronically)
- Via Conditions of Employment Contracts (on paper or electronically)
- Via Letters of Appointment (on paper or electronically)
- Via student birth certificates (on paper or electronically)
- Via criminal clearance certificates (on paper)
- Via national register for child protection clearance certificates (on paper)
- Via copies of ID documents (on paper and electronically)
- Via copies of degrees and certificates (on paper and electronically)
- Via copies of Curriculum Vitae (on paper and electronically)

PRIVACY POLICY

1. WHAT PERSONAL INFORMATION DO WE PROCESS?

1.1. STUDENTS:

Name and surname	Preferred language
Birthdate	Second language
Identification number	Religion
Nationality	Allergy information
Passport and permit for non-South African students	Dietary restriction information
Gender	Health concerns
Medical Aid information	Previous education information
Professional evaluations and diagnosis Academic records	Images, video, and voice recordings (in accordance with ENROLMENT CONTRACT and educational context)

1.2. PARENTS/GUARDIANS:

Name and surname	Relationship to student
Identification number	Nationality
Passport and permit for non-South African students	Title
Employer	Contact numbers (work, home, and personal)
Email address(es)	Home address

1.3. WE RETAIN AND PROCESS THE FOLLOWING INFORMATION OF DESIGNATED EMERGENCY CONTACT INDIVIDUALS:

Name and surname	Relationship to student
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Employer	Contact numbers (work, home, and personal)
Email address(es)	Home address

1.4. WE RETAIN AND PROCESS THE FOLLOWING INFORMATION OF EMPLOYEES:

Name and surname	Email address(es)
Identification number	Nationality
Passport and permit for non-South African students	Title
Home address	Contact numbers (work, home, and personal)
South African Council of Educators registration number	Tertiary education history
Banking details	South African Revenue Service Tax number

1.5. WE RETAIN AND PROCESS THE FOLLOWING NEXT OF KIN INFORMATION OF EMPLOYEES:

Name and surname	Relationship to employee
Employer	Contact numbers (work, home, and personal)

2. WHY DO WE PROCESS THIS ABOVE PERSONAL INFORMATION?

- 2.1. Contact parents/guardians or designated emergency contact individuals with news pertaining to their child, be it academic, medical, or general.
- 2.2. Share information pertaining to the school with parents/guardians.
- 2.3. Be aware of any special medical needs a student may have.
- 2.4. Contact Medical Aid schemes or home doctors if a student needs to be hospitalized or requires medical attention in an emergency.
- 2.5. To monitor dietary restrictions to put in place in the school kitchen, birthday celebrations and on school outings.
- 2.6. To establish awareness with parents regarding the religious affiliation and ethos of the school prior to confirming the child’s enrolment, particularly in the event of parties having different religious affiliations.
- 2.7. Contact previous education institutions with queries relating to students.
- 2.8. To comply with any government agency’s legitimate request for information.

EMPLOYEES:

- 2.10. Fulfil our requirements in accordance with the Code of Conduct of the South African Counsel of Educators.
- 2.11. Pay remunerations.
- 2.12. Contact employees with news pertaining to the school.
- 2.13. Contact employee’s next of kin in the event of an emergency.
- 2.14. Inform the South African Revenue Service of any relevant information in accordance with South African law.
- 2.15. Inform the Department of Labour of any relevant information in accordance with South African law.
- 2.16. To comply with any government agency’s legitimate request for information.

3. YOUR RIGHTS

- 3.1. Be informed of how your personal information is processed
- 3.2. Be informed of what personal information of yours is processed
- 3.3. Be informed of where your personal information is processed
- 3.4. Retract your consent for the use of any images or recordings of your child.
- 3.5. Retract your consent for your child to go on any supervised outings before that outing commences.
- 3.6. Be informed in the event of an identified data breach.
- 3.7. Request a copy of your data.
- 3.8. Request that your data be deleted (subject to approval).
- 3.9. Request that we restrict processing your data (subject to approval).
- 3.10. Object to what personal information we process.
- 3.11. Request that we rectify errors or outdated personal information.
- 3.12. Report any malfeasance on our part to the Information Regulator.
- 3.13. All data request forms are subject to justification, contract, law, and legitimate interest under South African law.

4. YOUR RESPONSIBILITIES

As a data subject whose personal information we process, you have the responsibility to ensure that your personal information is accurate and recent and to inform the school of any changes to your personal information.

DATA REQUEST POLICY

1. DATA REQUEST FORM

- 1.1. Forms are available on request from the office.
- 1.2. All persons may submit a data request form to request the execution of their data subject rights.
- 1.3. All requests are subject to identity verification before approval.
- 1.4. For every photocopy of an A4 size paper or part thereof a fee of R2 charged (copies printed in black & white).
- 1.5. The actual courier fee is payable when a copy of a record must be couriered to a requester.

2. WHAT IS THE TIMEFRAME FOR RESPONDING TO 'DATA SUBJECT ACCESS REQUESTS?'

- 2.1 We have one month (30 calendar days) to provide you with a decision, either to provide or deny you access to the information or records. The School may extend the period of 30 days by another period of 30 days, however, only one extension is allowed.
- 2.2 The period may be extended under certain prescribed circumstances, for example where the request is for many records and is time consuming to gather/collect.

3. REQUEST DENIED

In South African schools, you can deny access to certain information based on the following laws and regulations:

1. South African Schools Act (SASA) - Section 16: Confidentiality of pupil information
2. Protection of Personal Information Act (POPIA) - Exemptions from access to personal information
3. Promotion of Access to Information Act (PAIA) - Grounds for refusal of access to information

YOU CAN DENY ACCESS TO INFORMATION THAT:

- Is confidential or sensitive in nature (e.g., counseling records, medical information)
- Could potentially harm the student or others (e.g., disciplinary records, incident reports)
- Is exempt from disclosure under applicable laws (e.g., legal advice, personnel records)
- Is not relevant to the parent's legitimate educational interests
- Could compromise the privacy of other students or staff members
- Is not necessary for the parent to fulfill their parental responsibilities

WHEN DENYING ACCESS:

- Inform the parent of the reasons for denial
- Provide alternative solutions or redacted information where possible
- Document the request and denial for record-keeping purposes
- if a parent persists in requesting access to information that the school has denied, you can inform them that they may need to obtain a court order to compel the school to disclose the information.

SIGNATURE APPROVAL

BEHALF OF HEADS		DATE	
BEHALF OF SGB		DATE	
PRINCIPAL		DATE	