



## Ruth First Jeppe High School for Girls Memorial Trust

### PROTECTION OF INFORMATION POLICY

#### LEGISLATIVE FRAMEWORK

1. The Protection of Personal Information Act no 4 of 2013

#### OBJECTIVE OF THIS POLICY

1. To safeguard the personal information held by the Trust from threats, whether internally or externally, deliberate or accidental and thus protecting the right of privacy of all Data Subjects as listed in Appendix A of this policy.
2. Protecting the Trust's records and information as listed in Appendix A in order to ensure the continuation of the day to day running of the school.
3. Regulating the manner in which personal information is processed by the Trust.
4. Establishing an Information Regulator to ensure respect for and to promote, enforce and fulfil the rights of Data Subjects refer to in Appendix A

#### SCOPE:

The Board of Trustees and the Trust Manager are ultimately responsible for ensuring that information security is properly managed. The Trust Manager is the Information Officer. She is responsible for:

- The development and upkeep of this policy.
- Ensuring this policy is supported by appropriate documentation, such as procedural instructions.
- Ensuring that documentation is relevant and kept up to date.
- Ensuring this policy and subsequent updates are communicated to the Board of Trustees and staff where applicable.

The Information officer, and staff are responsible for adhering to this policy, and for reporting any security breaches or incidents to the Information Officer.

#### KEY PRINCIPLES:

The Information Officer and staff of the Trust are committed to the following principles:

- To be transparent with regards to the standard operating procedures governing the collection and processing of personal information.
- To comply with all applicable regulatory requirements regarding the collection and processing of personal information.
- To collect personal information only by lawful and fair means and to process personal information in a manner compatible with the purpose for which it was collected.

- Where required by regulatory provisions, to inform individuals when personal information is collected about them.
- To treat sensitive personal information that is collected or processed with the highest of care as prescribed by regulation.
- Where required by regulatory provisions or guidelines, to obtain individuals' consent to process their personal information.
- To strive to keep personal information accurate, complete and up to date and reliable for their intended use.
- To develop reasonable security safeguards against risks such as loss, unauthorized access, destruction, use, amendment or disclosure of personal information.
- To provide individuals with the opportunity to access the personal information relating to them and, where applicable, to comply with requests to correct, amend or delete personal information.
- To share personal information, such as permitting access, transmission or publication, with third parties only with a reasonable assurance that the recipient has suitable privacy and security protection controls in place regarding personal information.
- To comply with any restriction and/or requirement that applies to the transfer of personal information internationally.

#### Monitoring:

The Board of Trustees, the Information Officer and all staff, as defined by the Act, of the Trust are responsible for administering and overseeing the implementation of this policy and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes. Periodic reviews and audits will be conducted where appropriate, to demonstrate compliance with privacy regulation, policy and guidelines.

#### Operating controls:

The Ruth First Jeppe Memorial Trust shall establish appropriate privacy standard operating controls that are consistent with this policy and regulatory requirements. This will include:

- Allocation of information security responsibilities.
- Incident reporting and management.
- User ID addition or removal.
- Information security training and education.
- Data backup.

#### Implementation:

This policy is implemented by the Trust will be adhered to by all staff who are tasked with collecting and processing of personal information. Noncompliance with this policy may result in disciplinary action and possible termination of employment or mandate, where applicable.

This Notice explains how we obtain, use and disclose personal information, as is required by the Protection of Personal Information Act.

At the Ruth First Jeppe Memorial Trust we are committed to protecting your privacy and to ensure that personal information is collected and used properly, lawfully and transparently.

## APPENDIX A

### PERSONAL INFORMATION AND RECORDS

#### HELD BY RUTH FIRST JEPPE MEMORIAL TRUST

#### OF THE FOLLOWING DATA SUBJECTS

- 1) LEARNERS AS DEFINED BY THE SOUTH AFRICAN SCHOOLS ACT NO 84 OF 1996
  - a. Learner's application for the scholarship indicating the following personal information:
    - i. Name and Surname of the learner
    - ii. ID number of the learner
    - iii. Date of Birth
    - iv. Gender
    - v. Race
    - vi. Physical address and contact details
  - b. Supporting documents as follows
    - i. Birth certificates
    - ii. ID documents
    - iii. Report cards from previous school
    - iv. Study and asylum permits
  - c. Learner profiles
  - d. Application documentation
  - e. Promotion and assessment records
  - f. Extra and Co-curricula records
  - g. Behavioural records
  - h. Photographs of learners
  
- 2) PARENTS AS DEFINED BY THE SOUTH AFRICAN SCHOOLS ACT NO 84 OF 1996
  - a. ID documents of parents
  - b. Personal Information of parents
    - i. Name and Surname
    - ii. Date of birth and ID number
    - iii. Gender
    - iv. Race
    - v. Marital status
    - vi. Medical Aid
    - vii. Home and work physical and postal address
    - viii. Landline and mobile telephone numbers
    - ix. Home and work email address
    - x. Profession and Employment details
    - xi. Names of all the children in the family
  - c. The following proof of financial need documents
    - i. Proof of Income
    - ii. Bank Statements
    - iii. Other Financial documents proving income of parent
    - iv. Documentation proving other children in the family
  - d. Correspondence with parents

- 3) PAST RECIPIENTS
  - a. Personal Information details
  - b. Contact details
  - c. Correspondence
- 4) SPONSORS
  - a. Personal Information details
  - b. Contact details
  - c. Receipts – 18A
  - d. Donation Register
  - e. Correspondence
- 5) STATUTORY BODIES – SARS – INFORMATION REGULATORS – MASTER OF THE COURT
  - a. Personal Information details
  - b. Contact details
  - c. Statutory returns
  - d. Correspondence
- 6) SCHOOL AUDITORS
  - a. Personal Information details
  - b. Contact details
  - c. Certificates of their registration with an authorizing body
  - d. Audit reports
  - e. Contract of service
  - f. Statement of account
  - g. Financial statements
  - h. Correspondence
- 7) TRUSTEES
  - a. Personal information details of each trustee
  - b. ID documents of each trustee
  - c. Trust documents
  - d. Minutes of meetings
  - e. Correspondence
- 8) EDUCATIONAL INSTITUTIONS (PUBLIC-INDEPENDENT SCHOOLS OR UNIVERSITIES)
  - a. Personal information of institution
  - b. Contact details
  - c. Correspondence
- 9) TRUST RECORDS
  - a. Constitution
  - b. Strategic Plan – Development Plan and Improvement Plan
  - c. School Policies
    - Admission Policy
    - Financial Policy
    - Tour policy
    - Extra curricula policy
    - Hostel policy
    - Sport Policy
    - Code of conduct policy
  - d. Financial records
    - Financial Ledgers and books of first entry
    - Budgets
    - Financial statements
    - Reports on Financial matters
    - Bank statements and records
    - Details of all investment accounts

- List of all assets and inventory
- e. Incident Records
- f. Lease agreements
- g. Contracts
- h. Minutes of meetings
- i. Internal forms
- j. Correspondence