



Solid Foundations Primary School

Privacy Policy (2023/11)

1. **General**

- 1.1. In accordance with the Protection of Personal Information Act (November 2013), we define personal data as information relating to an identifiable natural or juristic person.
- 1.2. Data subjects refer to persons whose personal information is processed.

2. **Audience**

2.1. This policy is intended for the following:

- 2.1.1. Parents/guardians whose personal information and whose children's personal information we process.
- 2.1.2. Designated emergency contact individuals for students.
- 2.1.3. Employees of Solid Foundations Primary (Pty) Ltd (referred to hereafter as "the school").
- 2.1.4. Next of kin of employees of the school.

3. **How is your data collected?**

3.1. Your data is collected in the following ways:

- 3.1.1. Via application forms (on paper or the school's website).
- 3.1.2. Via enrolment forms (on paper).
- 3.1.3. Via indemnity forms (on paper).
- 3.1.4. Via Personal Information Update forms (on paper).
- 3.1.5. Via Agreement of Tuition Contracts (on paper).
- 3.1.6. Via Conditions of Employment Contracts (on paper).
- 3.1.7. Via Letters of Appointment (on paper).
- 3.1.8. Via Staff Enrolment Forms (on paper).
- 3.1.9. Via student birth certificates (on paper).

- 3.1.10. Via criminal clearance certificates (on paper).
- 3.1.11. Via national register for child protection clearance certificates (on paper).
- 3.1.12. Via copies of ID documents (on paper and electronically).
- 3.1.13. Via copies of degrees and certificates (on paper and electronically).
- 3.1.14. Via copies of Curriculum Vitae (on paper and electronically).

4. What personal information do we process?

4.1. We retain and process the following information of students:

- 4.1.1. Name and surname
- 4.1.2. Birthdate
- 4.1.3. Identification number
- 4.1.4. Nationality
- 4.1.5. Passport and permit information for non-South African students
- 4.1.6. Gender
- 4.1.7. Preferred language
- 4.1.8. Second language
- 4.1.9. Handedness
- 4.1.10. Religion
- 4.1.11. Allergies information
- 4.1.12. Dietary restriction information
- 4.1.13. Health concerns
- 4.1.14. Medical Aid information
- 4.1.15. Home doctor details
- 4.1.16. Previous education information
- 4.1.17. Images, video, and voice recording of student (in accordance with the Agreement of Tuition contract and educational context)

4.2. We retain and process the following information of parents/guardians:

- 4.2.1. Name and surname
- 4.2.2. Relationship to student
- 4.2.3. Identification number
- 4.2.4. Nationality
- 4.2.5. Passport and permit information for non-South African parents/guardians

- 4.2.6. Title
- 4.2.7. Employer
- 4.2.8. Contact numbers (work, home, and personal)
- 4.2.9. Email address(es)
- 4.2.10. Home address

4.3. We retain and process the following information of designated emergency contact individuals:

- 4.3.1. Name and surname
- 4.3.2. Contact numbers (work, home, and personal)
- 4.3.3. Email address(es)
- 4.3.4. Relationship to student

4.4. We retain and process the following information of employees:

- 4.4.1. Name and surname
- 4.4.2. Identification number
- 4.4.3. Nationality
- 4.4.4. Passport and permit information for non-South African employees
- 4.4.5. Contact numbers (home and personal)
- 4.4.6. Email address(es)
- 4.4.7. South African Council of Educators registration number
- 4.4.8. Home address
- 4.4.9. Tertiary education history (Institution, programme, and year of completion)
- 4.4.10. Banking details (Account number, Bank, and Branch code)
- 4.4.11. South African Revenue Service Tax number

4.5. We retain and process the following next of kin information of employees:

- 4.5.1. Name
- 4.5.2. Relationship to employee
- 4.5.3. Contact number (personal)

5. Why do we process this personal information?

5.1. We process this personal information of students, parents/guardians, and designated emergency contact individuals in order to:

- 5.1.1. Contact parents/guardians or designated emergency contact individuals with news pertaining to their child, be it academic, medical, or general.
- 5.1.2. Report information to the government on the South African School and Administration Management System (SASAMS) in line with what is required for South African schools.
- 5.1.3. Share information pertaining to the school with parents/guardians.
- 5.1.4. Be aware of any special medical needs a student may have.
- 5.1.5. Contact Medical Aid schemes or home doctors in the event that a student needs to be hospitalised or requires medical attention.
- 5.1.6. Monitor dietary restrictions to put in place in the school kitchen, birthday celebrations and on school outings.
- 5.1.7. Establish awareness with parents regarding the religious affiliation of the school prior to confirming the child's enrolment, particularly in the event of parties having different religious affiliations.
- 5.1.8. Contact previous education institutions with queries relating to students.
- 5.1.9. To comply with any government agency's legitimate request for information.

5.2. We process this personal information of employees in order to:

- 5.2.1. Fulfil our Umalusi requirements in accordance with the Code of Conduct of the South African Counsel of Educators.
- 5.2.2. Pay remunerations.
- 5.2.3. Contact employees with news pertaining to the school.
- 5.2.4. Contact employee's next of kin in the event of an emergency.
- 5.2.5. Inform the South African Revenue Service of any relevant information in accordance with South African law.
- 5.2.6. Inform the Department of Labour of any relevant information in accordance with South African law.
- 5.2.7. To comply with any government agency's legitimate request for information.

6. Where is your data processed?

6.1. Your data is processed by the following means:

- 6.1.1. Paper forms that are kept in a secure cabinet.
- 6.1.2. The school's administration accounts (via Google) that are password protected.

- 6.1.3. Teacher mark books (paper and electronic).
- 6.1.4. Electronic copies of names and contact information (on teachers' personal devices that are password protected in accordance with our data management policy).
- 6.1.5. Learner Profiles (on paper) that are kept in a secure cabinet.
- 6.1.6. Two physical sheets of pupil names and contact information that is kept in a locked drawer in the front office and on the person of Joanne Small for After Care.

7. What happens in the event of a data breach?

- 7.1. A data breach is defined as any unauthorized access, use, misuse, disclosure, destruction, modification, or disruption of personal information.
- 7.2. In the event of a suspected data breach, the following will occur:
 - 7.2.1. The Information Officer (The Principal or Deputy Head) will follow the data management procedure to determine whether there has been a breach and the nature of the breach.
- 7.3. In the event that a breach has been identified, the following will occur, as required by our Data Management Policy:
 - 7.3.1. The Information Officer will inform the Information Regulator as soon as a breach has been identified and internal processes have been followed.
 - 7.3.2. The Principal will then inform all stakeholders that a data breach has occurred.
 - 7.3.3. The Principal will launch a formal internal investigation into the data breach and inform Data Subjects of the result after the investigation is concluded.

8. Your rights

- 8.1. As a data subject whose personal information we process, you have the right to:**
 - 8.1.1. Be informed of how your personal information is processed (Section 2 of our Privacy Policy).
 - 8.1.2. Be informed of what personal information of yours is processed (Section 3 of our Privacy Policy).
 - 8.1.3. Be informed of where your personal information is processed (Section 4 of our Privacy Policy).
 - 8.1.4. Retract your consent for the use of any images or recordings of your child.

- 8.1.5. Retract your consent for your child to go on any supervised outings before that outing commences.
- 8.1.6. Be informed in the event of an identified data breach.
- 8.1.7. Request a copy of your data.
- 8.1.8. Request that your data be deleted (subject to approval).
- 8.1.9. Request that we restrict processing your data (subject to approval).
- 8.1.10. Object to what personal information we process.
- 8.1.11. Request that we rectify errors or outdated personal information.
- 8.1.12. Report any malfeasance on our part to the Information Regulator.
- 8.2. Note that all of these requests for 8.1.7.-8.1.11. must be submitted in writing and that each request is subject to justification, contract, law, and legitimate interest under South African law.

9. Your responsibilities

9.1. **As a data subject whose personal information we process, you have the responsibility to:**

- 9.1.1. Ensure that your personal information is accurate and recent and to inform the school of any changes to your personal information.

10. Cookies and tracking notice

- 10.1. Our website does not utilize cookies.

11. How to contact us

- 11.1. Contact us by email at admin@solidfoundationsprimary.com or by phone 011 976 5300.