



GLENOAKS SCHOOL
Where learning is nurtured and
potentials are reached

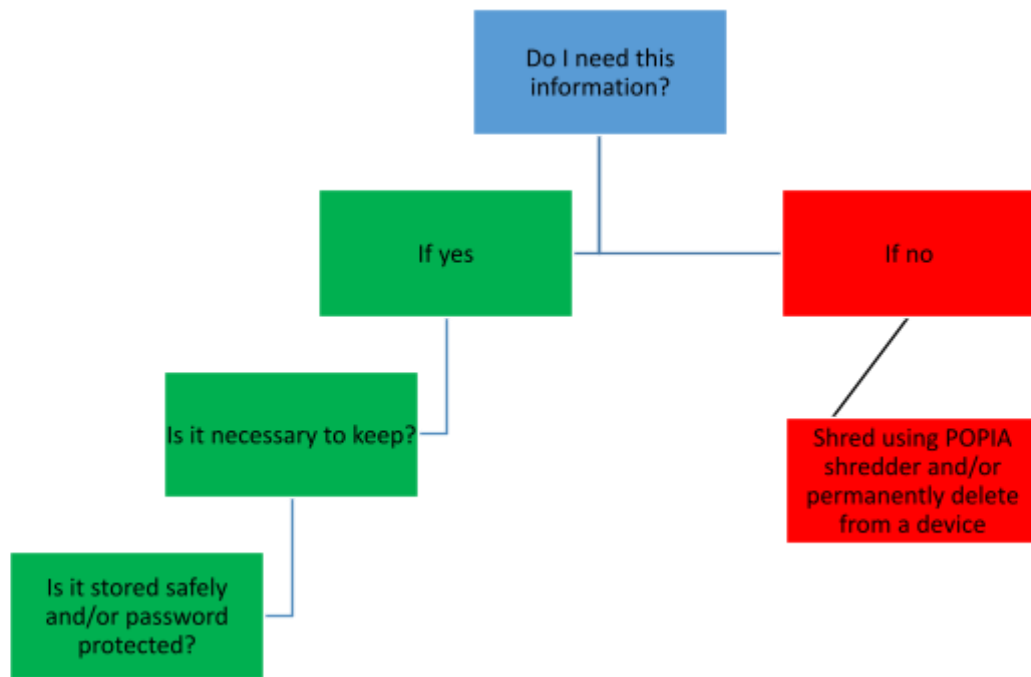
POPIA

Full POPIA Policy 5th Draft March 2024

In this policy the use of the words parent/parents/guardians are used interchangeably to mean the people who have legal parental roles of a learner

A. OVERALL POPIA PRINCIPLES THAT MUST BE FOLLOWED BY ALL STAFF EMPLOYED BY GLENOAKS SCHOOL:

1. All and any communication sent by a staff member: before you click send – check that what you have written is appropriate and sent to the correct person.
2. Be vigilant at all times with any personal information in your possession
3. **Mindset Shift:** No longer just print, print, print.
4. Try not to take personal information home, if you do need to, bring it back as soon as possible.
Wherever you place information ensure that it is secured (password protect all devices, keep information in your locked boot if travelling, at home keep information in locked cupboards and not lying around visible and accessible to others).
5. At all times keep the following in mind:



B. WHAT INFORMATION IS KEPT BY GLENOAKS AND WHERE?

1. Learner records are kept in Green Learner files (in the administrator's office), on D6 and on a GO Kids folder system (stored by our school servers and on OneDrive, accessible by staff, with password protection in place. Personal learner information is also kept on the Karri App, OnExpand and in teacher/therapist personal files.
2. Parent's personal information (financial, ID, physical and postal addresses, medical aid) are kept on D6+, Karri App, Sage Pastel and payment profiles shared with TPN and by the bursar on her personal device).
3. Staff must give consent regarding the school being able to retain personal information for seven years following the termination of employment period.
 - 3.1. Payroll information is kept on D6+, SAGE Payroll, Karri App, OnExpand, SARS Easy-File, FNB, and hard copy employee information forms are kept by the bursar. Employment information is sent monthly to Alexander-Forbes/Sanlam, TPN, UIF and to the Department of Labour (as requested annually).

- 3.2. Staff annual updates of personal information forms are kept by the administration office for that specific year before being shredded (this will be moved only to D6 digital versions for updating personal information from 2022).
- 3.3. CV including professional information (qualifications, registrations, Guardian police, sexual offences register and other related safety check records), appraisal, and meeting records as well as incident reports are kept by the principal for a period of 7 years.
- 3.4. Leave requests are emailed to the bursar, HOD and principal. Any hard copies are kept by the principal.
4. Contact numbers and email addresses for parents, learners and staff are kept by the relevant staff and on D6 for the purposes of communication and in case of an emergency, in the best interests of staff, parents and learners.
5. D6 is fully accessible by teachers and therapists, however information other than absenteeism can only be changed by allocated staff.
6. When advertisements are placed for vacant positions, the following caption must appear.
Glenoaks School, in line with POPIA (Protection of Personal Information Act) will attempt to ensure the confidentiality of all applicants for this role. All reasonable measures will be in place to protect personal information but will be used in the recruitment, selection, and reporting process. By submitting your application for this position, you are recognising and accepting this disclaimer.
7. Communication sent to the email address info@glenoaks.org.za is automatically forwarded to the principal, bursar, school administrator and head of marketing.
 - 7.1. New applications are printed and filed by the school administrator or principal (communication beforehand so that this is not duplicated). This information is stored by the principal and is accessed by staff who are involved in the application and trial process.
 - 7.2. Information related to credit checks or financial queries are printed and stored by the bursar.
 - 7.3. Marketing information is printed/stored by the head of marketing.
 - 7.4. Where there is an overlap, communication between these parties must take place to ensure that unnecessary copying does not take place.
 - 7.5. This information may be stored on all of these member's devices which are password protected. Should there be a breach on any of these devices the contracted IT company can remove access to these, as per the breach process.
8. Further information in this regard can be found in the POPIA MAPPING Tables (see annexure 1 – full version for staff and refined and strategically worded for the website and parents – taken out for the refined version is who is accountable, accessed by, operators, storage, and cross border transfers).

C. DIGITAL SECURITY AND COMMUNICATION

1. Wi-Fi
 - 1.1 Glenoaks School runs Wi-Fi connectivity which enables staff and learners to work effectively. There are 2 different Wi-Fi connections. One is for the purpose of teaching, therapy and administration. This connection is active during weekdays from 6:00 to 17:00. The second connection is for learner use and is active weekdays from 08:00 to 14:00.
 - 1.2 Private use of the school Wi-Fi, outside of necessary daily communication or teaching needs is prohibited and monitored. Overuse or unfair use (downloading music and media not for learning purposes) will be reported as this inhibits the connectivity for school purposes.
 - 1.3 These restrictions are in place due to the protection of personal information owned by the school.
2. Staff that have any kind of school information on their laptops/cell phones/tablets need to have a secure password on it. The password should consist of the following:
 - Must have 8 characters.
 - 1 Uppercase letter
 - 1 Lowercase letter
 - 1 special character (%#@&*(!;)
 - 1 number

3. All passwords should be changed once every two or three months and should not be stored in a place where it could be compromised.
4. Staff may only use their school email accounts (glenoaks.org.za) for all school-related issues. This is the only account that may be used to communicate between staff, parents, and other professionals. For online learning the golearners.org.za mail address can be used. Please do not use this golearners address for any information other than learning content.
5. All staff emails must contain the following caption below your email signature:
The views and opinions expressed in this e-mail do not necessarily express or reflect the views and/or opinions of Glenoaks School. Glenoaks School shall not be liable for any damage caused by the contents of this email. The information in this e-mail or documents attached is private and confidential, intended for the attention only of the addressee. If you are not the intended recipient, you are hereby notified that any disclosure, copying or distribution of the contents of this email, or the taking of any action in reliance thereon or pursuant thereto, is strictly prohibited. Should you have received this email in error, please delete it and any attachments immediately. Glenoaks School will not be liable for any unauthorised use of, or reliance on, this email or any attachment. This email is subject to and incorporates our POPIA policy.
6. Digital communication groups (e.g. WhatsApp, SMS, email, other messaging platforms that may be used in the future)
 - 3.1. For WhatsApp/SMS – Please refer to any child using their first name and grade, not surnames. This is so that messages are less identifiable should a phone be stolen, go missing
 - 3.2. Emails
 - i) Be careful of sending a message to a large number of recipients. Use the bcc function so that email addresses are not seen by all recipients.
 - ii) Be careful of forwarding, that the information below your current message, and the attached email addresses have permission to be forwarded.
 - iii) Email signature
 - 3.3. Social media (WhatsApp groups, Facebook, Instagram ...) please only post pictures where you have been given consent by parents to share with other parents or a wider circle.
 The marketing group will have a list of where permission has been given annually, but it is always safer to check first anyway, if you are not part of the marketing team and are posting.
 Please also remind parents on your WhatsApp groups, when posting pictures, not to share pictures of other children on their social media accounts.
 - 3.4. Any communication regarding a child, with an outside of Glenoaks School professional requires the specific consent of the parent/s or guardians, and preferably in writing or noted with a date and time. The professional receiving the communication can also then be assured that this consent has been given. You could send an email to the parent requesting this communication, then use this email and forward it to the professional with your message/ feedback.

D. RETENTION OF LEARNER RECORDS, COMMUNICATION AND DIGITAL MEDIA

1. By February of each new academic year, teachers and therapists must pass relevant information to the next teacher/therapist and then delete this information from their own devices and hard copies must be shredded using the POPIA compliant shredder. This includes pictures and videos from all their devices regarding students. You may not keep any information about students who you do not currently work with. Contact details of parents must be de-personalised.
2. Staff may not share personal information about staff, learners, or parents outside of the school community without written consent. This includes contact numbers and email addresses.
3. Should a teacher or therapist request a facilitator or classroom assistant to assist in typing up reports, information on GO Kids, shredding, filing or any other use of this information, it must be noted that the responsibility for this information lies directly with the therapist or teacher.

E. STAFF LEAVING PROCEDURES

1. All staff members need to sign the Staff Exit Checklist a week before they leave the school. This checklist must be signed by the Information Officer or one of the Deputy Information Officers.
 - a) This states that they hand over all Glenoaks related information (including child/parent information) to their HOD. Hard copy files need to be handed in to HOD's for storage or for safe destruction. All school resources need to be handed in to the HOD.
 - b) Important information must be added to the allocated places before they are deleted or destroyed (D6, Go Kids, Umalusi File, and Green files)
 - c) This also states that they must delete all Glenoaks-related information from all their devices/clouds. This includes:
 - Case discussion notes
 - Reports
 - School related emails
 - Contact details of parents (or depersonalise the contact number)
 - Glenoaks groups (staff, grade, therapy, individual learners, etc.)
2. The staff members' GO learner email address will be removed and deleted. (Global sense will delete all emails and remove the staff member from their school email account.)
3. The staff member will be deleted from Seesaw and Google classroom platforms.
4. According to the HPCSA, therapists must store all records of a child, however being employed by Glenoaks School this information is the property of Glenoaks. Thus, a therapist who is leaving Glenoaks has the following options when they leave the school:
 - Option 1 – Hand all records over to HOD for future therapy or safe keeping. You have the right to seal and place this information in the secured storage areas allocated by the school. You also may request that the school sign confirmation that you have handed this information over and detail who or when these files may be opened or destroyed.
 - Option 2 – Should the therapist want to continue seeing a child in their private capacity and want to retain their records of parent/child personal information; written consent must be given by both parents or legal guardians to transfer ownership of this information from Glenoaks School to the therapist in their private professional capacity.

F. STORAGE AND DESTRUCTION OF INFORMATION

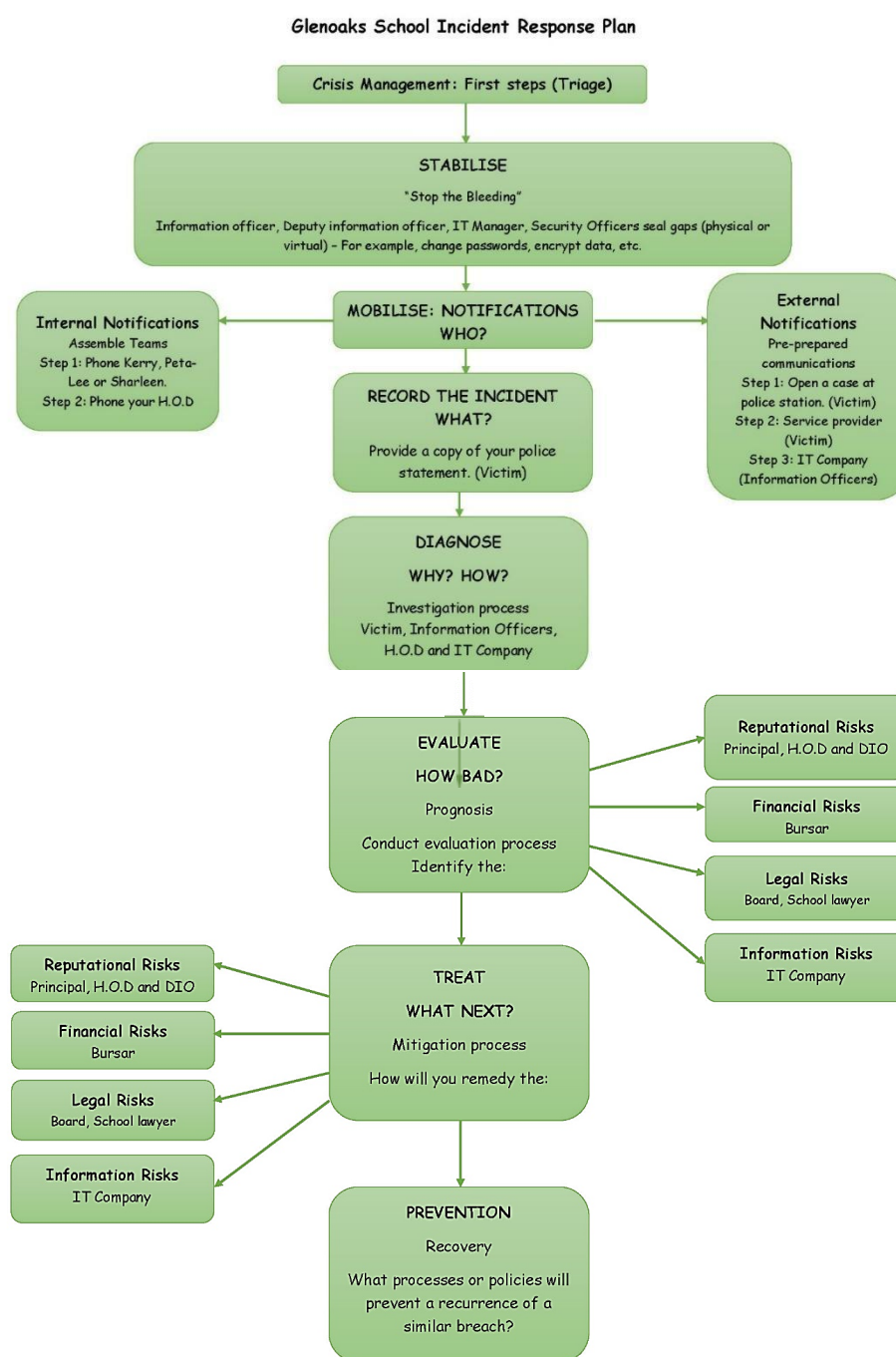
1. Files containing learner historical documentation and assessments are kept in LOCKED cupboards in the administration offices, which are locked at all times.
2. Staff wanting to read these files need to complete the check-out form before borrowing a file to read through. Contents may not be photocopied, and records may not be removed. These files may not be taken home or left in a classroom overnights or weekends. Files must be checked back in when returned.
3. Personal staff files containing identifiable personal information on learners or parents must be kept in a locked storage space in class and therapy rooms. Keep this information to a minimum and only what is essential to have. The less identifiable the better.
4. Information regarding staff will be kept in a locked cupboard in the principal and bursar's office.
5. Please note that emergency contact information (of staff and learners), including next of kin, will be kept in hard copy, on a list, in the administrator's office, for anyone who may need to access it. The reasoning for this is that in an emergency digital copies may not be available. This will consist of name, contact number and relationship to the learner or staff member.
6. Past learner files are kept in a locked storeroom, care of the school administrator.

7. Personal records and any identifiable information must be carefully destroyed. These cannot simply be recycled or torn and thrown away. According to POPIA, these must be shredded using a criss-cross shredder so that information cannot be easily reproduced. It is each staff member's responsibility to ensure that they destroy such documentation in this manner.
8. As it pertains to HPCSA records, please note the following published by the HPCSA *Guidelines on the Keeping of Patient Records*:
 - The records of minors should be kept until their 21st birthday.
 - The records of patients who are mentally impaired should be kept until the patient's death.
9. Staff records will be kept for a period of 7 years, by the administrator, bursar, or principal.

G. CCTV FOOTAGE

1. In maintaining the highest security standards, we have CCTV's on the school premises. The recorders are kept in the administrator's office, locked after-hours.
2. This digital information is stored for 2 weeks until the hard drive records over this footage

H. BREACH OF INFORMATION PRIVACY PROCEDURE



1. Persons whose personal information has been accessed needs to be made aware of this breach within 48 hours to safeguard their privacy.
2. The information officer and deputy officers may require you to assist them in this reporting process, depending on the extent of the breach.
3. Staff members who are found to have been negligent in protecting the personal information of a learner, parent/guardian or staff member may be dealt with under a disciplinary process.

POLICY: REVISION HISTORY

<i>Version</i>	<i>Date</i>	<i>Comments</i>
1. First Draft	May – July 2021	Initiation of POPIA, draft after attendance at 3 ISASA workshops.
2. 2 nd Draft	August 2021	Added MAPPING table, comments by bursar and lawyer on board
3. 3 rd Draft	September 2021	Corrections as per Rui and Gerrit.
4. 4th Draft	May 2023	Review
5. 5th Draft	March 2024	Amended Goal and Oakhouse Academy to Junior and Senior Academy
6.		
7.		
8.		

POPIA POLICY ADDENDUM 3:

Staff Exit Checklist

Hard Copies/resources	Checked
All necessary info is placed in the Green File and the Umalusi File	
Hard Copy files handed to HOD's for storage	
Any other type of information regarding students, parents and staff that is not placed in files must be handed to the HOD to be shredded. (Emergency pack)	
All school resources handed to HOD	
Digital/portable	Checked
All necessary info is uploaded onto Go – Kids	
All Glenoaks School learner notes, reports are deleted from cellphone/tablet/laptop	
Go learners and Glenoaks School email address are removed from cellphone/tablet/laptop	
Staff members are deleted off Seesaw/Google Classroom	
IT delete all emails and remove staff members from Glenoaks School account.	
All WhatsApp conversations are deleted between parents/students on cellphone	
All Glenoaks School related WhatsApp groups are deleted on cellphone	
Delete or depersonalized numbers of parents	
Delete all pictures of Glenoaks School students on phone and laptop	

I _____ give consent for Glenoaks School to retain personal information about myself.

Signed by staff member

Full Name

Date

Signed by HOD

Full Name

Date

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Signed by Information Officer/
Deputy Information Officer

Full Name

Date



POPIA POLICY ADDENDUM 4:

WhatsApp Staff Groups and Social Media Consent Form

(In line with the Protection of Personal Information Act 4 of 2013 (POPIA))

The purpose of these groups are to keep you informed, to support our learners, parents and colleagues. Any WhatsApp groups require the use of your telephone number. This means that other people in the group can see your contact telephone number. We are committed to ensure that any personal information you provide is handled fairly and confidentially and in accordance with Data Protection legislation. We will not share your mobile number with any third party and will only be shared with the WhatsApp group, however it will be visible to group members.

As marketing is a vital part of our school's existence, we request that you also give consent to participate in social media posts and articles promoting Glenoaks.

Glenoaks School Rules for Self-Management of Social Media and WhatsApp Groups

To ensure we are all well connected and use this facility correctly and safely, here are a few ground rules for using the WhatsApp Groups.

1. Respect others as individuals - giving the other person our attention, responding politely and not ridiculing what other people say. Remember – not everyone will have the same opinion and that is perfectly OK!
2. Respect others' culture, race and background - realising that we are all different.
3. Respect others' privacy and confidentiality – you must not share contact numbers of participants in the group to anyone else and remember that anything discussed in the group must be treated confidentially.
4. No bullying, harassment, or discrimination.
5. No use of explicit / sexual language.
6. No Tolerance Policy – a member of Glenoaks School team will be part of the group chat to both participate and monitor conversations to help and support when required. We may ask you to remove comments or chat that is not appropriate. In rare cases, we may need to remove you from the group if deemed necessary.
7. Make a Rule – if you wish a rule to be added here then get in touch and let us know.
8. Remember – this facility is NOT a replacement for emergency situations. WhatsApp will not be monitored 24/7
9. By being a member on the group you agree not to share photographs, videos or content sent on the group of children who are not your own. Should you wish to post anything which includes children or staff, you will need to obtain the consent of these parents in writing.

If you agree with allowing us to invite you to this group, please complete the section below:

	Reply Yes/No
Do you wish to remain part of the WhatsApp groups	
I understand that I can leave the group at any point without giving any notice or reason for leaving (but understand that you will then be responsible for finding out daily messages from a colleague, at their convenience)	

I have read and understood the rules for participating in the WhatsApp Group chat.	
I understand that discussion in the group will be monitored by a Glenoaks School Principal and Administrators	
I understand that I will not forward messages, images or videos from this group to anyone outside of the staff group or on social media.	
I understand that messages may not be derogatory or discriminatory and may not be of a political nature.	
I understand that weekend and after-hours messages will be limited to what is important, and I may silence notifications or answer when possible	
I will reply privately to matters that relate only to one person	
I agree to have my photograph used on the WhatsApp groups, as well as on social media for marketing purposes.	
I understand that information on the group is confidential and is posted in the best interests of learners and colleagues.	

I, _____ (name), hereby confirm, by signing below, that I have read and clearly understand the contents of the Glenoaks School POPIA policy, including the WhatsApp and Social Media Consent form.

I agree to abide by the conditions and rules set herein.

Name: _____ Signature: _____

Date: _____ Place: _____



POPIA POLICY ADDENDUM 1:

Social Media and WhatsApp Groups Consent Form

(In line with the Protection of Personal Information Act 4 of 2013 (POPIA))

Glenoaks School aims to keep our parents and students up to date as to the activities at school and in the classrooms, as well as to keep abreast of any notices and your child's progress. For this reason, we would like to continue our class and various other support group chats using the WhatsApp facility. These groups use your phone number(s) in order to be a part of the group. This means that other people in the group can see your contact telephone number.

We are committed to ensure that any personal information you provide is handled fairly and confidentially and in accordance with Data Protection legislation. We will not share your mobile number with any third party and will only be shared with the WhatsApp group, however it will be visible to group members.

For marketing purposes, the school has a Website, Facebook, LinkedIn and Instagram page that showcases the school, advises parents of events and important information and displays exciting and educational news. The Website address is www.glenoaks.org.za. You can find us on Facebook at **Glenoaks School** at <https://www.facebook.com/profile.php?id=100091951270817>, **LinkedIn** at <https://www.linkedin.com/company/91025710/admin/feed/posts/> on **Instagram** at [@glenoaksschool](https://www.instagram.com) at <https://www.instagram.com>. Please become regular viewers and supporters of these pages and refer others to them.

We also advertise the school in various online and printed publications during the year.

To keep the Website, Facebook, LinkedIn and Instagram Pages current and to provide updated images for advertising, we post photographs of the school, class activities, sport, outings, and projects.

We require your permission to have your child included in these images. Any photograph will be used only for the Glenoaks Websites, Facebook, LinkedIn and Instagram Pages, advertisements and articles. We require permission to be given annually.

Please answer the question below on this form to indicate whether you DO or DO NOT give permission for your child to be included in any social or printed media.

Please note: By providing permission for your child's image to appear on the Glenoaks School's Website, Facebook, LinkedIn and Instagram Pages and articles, you hereby indemnify and hold Glenoaks School harmless against any claim(s) of any nature whatsoever, which may arise by reason of the posting of your child's image to appear on the Glenoaks School's Website, Facebook, LinkedIn and Instagram Pages, advertisements and articles.

Glenoaks School Rules for Self-Management of WhatsApp Groups and Social Media

To ensure we are all well connected and use these facilities correctly and safely, here are a few ground rules for using WhatsApp Groups and Social Media Platforms.

1. Respect others as individuals - giving the other person our attention, responding politely and not ridiculing what other people say. Remember – not everyone will have the same opinion and that is perfectly OK!
2. Respect others' culture, race and background - realising that we are all different.
3. Respect others' privacy and confidentiality – you must not share contact numbers of participants in the group to anyone else and remember that anything discussed in the group must be treated confidentially.
4. No bullying, harassment, or discrimination.
5. No use of explicit/ sexual language.
6. No Tolerance Policy – a member of Glenoaks School team will be part of the group chat to both participate and monitor conversations to help and support when required.
7. Remember – this facility is NOT a replacement for emergency situations. WhatsApp will not be monitored 24/7
8. All communication with staff may only take place between 07h00 and 17h00.
9. By being a member of the group you agree not to share photographs, videos or content sent on the WhatsApp groups, of children who are not your own.

As a parent, if a video or photograph is taken of your child, you may only send it to relatives/ friends/ colleagues/ others or post on social media if it is only of YOUR child.

Should you wish to post anything which includes other children, you will need to obtain the consent of these parents in writing.

WhatsApp Group and Social Media Participant Consent Form

It is important to submit this form even if your answer is NO so that we follow protocol and keep an accurate record.

	Please write Yes/No
Do you wish to join/remain part of the WhatsApp group?	
I understand that I can leave the group at any point without giving any notice or reason for leaving.	
I have read and understood the rules for participating in the WhatsApp Group chats and social media posts.	
I agree that videos and pictures of my child can be sent on the class WhatsApp group.	
I understand that discussion in the groups will be monitored by a Glenoaks School member of staff.	
I give permission for my child to appear on the Glenoaks School Website, Glenoaks Facebook, LinkedIn, Instagram Page, advertisements and Articles.	
I give permission to have my child included in the annual group class photograph.	
Learner's Name: _____ Learner's Class: _____ Parent/Guardian Name/s (both in _____ Cell Number: _____ the case of shared custody): _____ Cell Number: _____	

I/we, _____, _____, (parent/ guardian) of (child's full name) _____
hereby confirm, by signing below, that I have read and clearly understood the contents of the Glenoaks School POPIA policy, including the WhatsApp and Social Media Consent form. In the case of divorce or where parents share custody/ guardianship of a child, both parents/ guardians must sign and return this form.

I agree to abide by the conditions and rules set herein.

Name: _____ Signature: _____

Name: _____ Signature: _____

Date: _____ Place: _____