



Policy Title	Privacy Policy						
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Date of First Issue	January 2021						
Date of Amendments							
Date of Approval Letaba Educational Trust	March 2021						

## PRIVACY POLICY

### 1. INTRODUCTION

The Privacy Policy explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (POPIA). According to the Act “**personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Stanford Lake College takes data protection seriously and we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

### 2. PURPOSE

**This document is the undertaking of Stanford Lake College to conform to the POPI act.** It provides detailed information about how we treat information that you provide to us.

The Protection of Personal Information Act No 4 of 2013 (POPI) promotes the protection of personal information and the retention of documents by public and private entities. This policy guides the way in which all employees of Stanford Lake College are required to use, disclose and destroy personal information appropriately, transparently, securely and in accordance with applicable laws. It also stipulates for what purpose this information will be used.

Our Information Officer can be contacted by email on [privacy@slc.co.za](mailto:privacy@slc.co.za) if you have any queries regarding your personal data.

### 3. SCOPE

This policy and procedure applies to all employees, parents, pupils and service providers of Stanford Lake College.

### 4. TYPES OF PERSONAL DATA WE PROCESS

We process personal data about prospective, current and past: pupils and their parents; staff, suppliers and contractors; donors, friends and supporters; and other individuals connected to or visiting Stanford Lake College. The personal data we collect, process and store will be personally identifiable information related to pupils and their parents, staff, suppliers and contractors, donors, friends and supporters. The personal data processed includes recorded information that is true and correct and/or video and photographic images about an individual.

Information collected by Stanford Lake College includes;

- names, addresses, identity numbers, telephone numbers, e-mail addresses and other contact details;
- family details, marital status and number of dependents;
- admissions, academic, disciplinary and other education related records, information about special



- educational needs, references, examination scripts and marks;
- attendance information (such as number of absences and absence reasons);
- education and employment data;
- images, audio and video recordings;
- financial information, including bank details and credit history; and
- education and schooling history.

Other types of data we collect, process and store includes protected health and medical information, criminal record information and other sensitive information related to an individual. Information such as;

- information about health status or provision of healthcare linked to a specific individual;
- information about criminal records linked to a specific individual; and
- characteristics (such as race and/or ethnicity, religion, language, nationality and country of birth)

## **5. HOW WE COLLECT PERSONAL DATA**

Stanford Lake College collects information in several ways, including:

- in person and over the phone: from students and their family, staff, volunteers, visitors, job applicants and others;
- from electronic and paper documentation: including job applications, emails, invoices, enrolment forms, letters to our school, consent forms, our school's website or school-controlled social media;
- through online tools: such as apps and other software used by our school as well as website cookies;
- through any CCTV cameras located on the school campus;
- through third parties, such as referees, previous schools, professionals or authorities working with the individual; and
- through publicly available resources.

## **6. PURPOSE FOR WHICH WE PROCESS PERSONAL DATA**

Stanford Lake College processes personal data to lawfully and legitimately support the school's operation as an independent school. Our school collects information about students and their families when necessary to:

- select and admit students;
- educate students and support pupil learning;
- administer pupils' entries to IEB examinations;
- to monitor and report on pupil progress including providing academic reporting on each student and publishing of results;
- provide references for current and past pupils;
- to provide appropriate pastoral care, support students' social and emotional wellbeing, and health;
- support operational management of the school including administration of pupil records; the administration of invoices, fees and accounts; the management of the school's property; the management of security and safety arrangements (including the use of CCTV in accordance with our CCTV Policies and monitoring of the school's IT and communications systems in accordance with our IT Acceptable Use Policy); management planning and forecasting; research and statistical analysis; the administration and implementation of the school's rules and policies for pupils and staff; the maintenance of historic archives and other operational purposes;
- fulfil legal requirements;
- take reasonable steps to reduce the risk of reasonably foreseeable harm to students, staff and visitors (duty of care);
- make reasonable adjustments and support for students with special needs;
- provide a safe and secure working and school environment;
- communicate with parents about students' schooling matters and celebrate the efforts and achievements of students;
- maintain the good order and management of our school;
- promote the school on our school's website or school-controlled social media, the school prospectus, in the weekly Snapshot newsletter, in the annual Stanfordian magazine, in the quarterly Alumni newsletter



- and other publications and communications conducted by the school; and
- promote the school in local newspapers to celebrate the efforts and achievements of pupils.

Our school collects information about staff, prospective staff and contractors when necessary for:

- the administration of staff records;
- the recruitment of staff;
- the engagement of contractors;
- administration of payroll, pensions and sick leave;
- staff appraisal;
- disciplinary procedures;
- administration of human resources records; and
- providing references.

## 7. HOW WE PROCESS PERSONAL INFORMATION

As a school, Stanford Lake College is lawfully required to share personal information with relevant authorities such as:

- the Department of Education;
- government services such as Visa and Immigration, Revenue and Customs; and
- other third party professional services as necessary i.e. the police and Southern African Council for Educators (SACE).

Our members of staff collect, process and store personal information only for the purpose for which it is intended.

We routinely share pupil information with:

- schools that the pupils attend after leaving us;
- the IEB and exam bodies for entering pupils;
- the Round Square International Organisation; and
- medical institutions should a child fall sick or be injured whilst at school.

When sharing data with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information we remain responsible for is kept secure and is used only in accordance with the school's specific directions. We will ensure that anyone to whom we pass personal information agrees to treat such information with the same level of protection as we are obliged to.

## 8. HOW LONG WE KEEP PERSONAL DATA

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. At a minimum, pupil data will be held for the duration of time each child remains a pupil of Stanford Lake College. Our Information Officer can be contacted by email on [privacy@slc.co.za](mailto:privacy@slc.co.za) if you have any queries regarding the retention of your personal data.

## 9. YOUR RIGHTS

Under Data Protection Law anyone who we collect personal information about has rights regarding the collection, processing and storage of their personal data. These rights are, however, subject to certain exemptions and limitations.

You have the right to:

- access and understand the personal data we hold about you;
- access and understand the personal data we hold about your child;
- ask for the personal data we hold about you and/or your child to be erased (this is with limitations and exceptions as we may have lawful reason to hold such data);
- ask for the personal data we hold about you and/or your child to be amended;
- ask us to stop processing such data (this is with limitations and exceptions as we may have lawful reason



- to process such data);
- withdraw consent to process your personal data or your child's personal data (this is with limitations and exceptions as we may have lawful reason to process such data regardless of consent)

Our Information Officer can be contacted by email on [privacy@slc.co.za](mailto:privacy@slc.co.za) if you have any queries regarding your rights. Any request for data we store and process about you must be completed in writing.

## **10. SUBJECT ACCESS REQUESTS AND CORRECTION OF YOUR INFORMATION**

Under Data Protection Law you have the right to request information or request to delete information we store about you and/or your child without incurring costs. We are only obligated to provide information that is related to you and your child (depending on legal custody).

Any data access request is, however, subject to certain exemptions, limitations or contractual obligations. Data belonging to or identifying other individuals is exempt from right of access and will be subject to legal privilege. We cannot disclose confidential information related to the purpose of providing education, examinations or supplying examination scripts to external bodies. We cannot disclose confidential information on any of our staff.

Any request for data we store and process about you or your child must be completed in writing. The Subject Access Request form can be obtained from our Information Officer by email on [privacy@slc.co.za](mailto:privacy@slc.co.za). Data Protection Law allows us to respond to any such written requests within one calendar month. Excessive requests or simultaneous requests for the same information may incur an administration fee or be refused where Data Protection Law allows us to do so.

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. ADAM has now been updated so parents and guardians can update information such as residential addresses, contact information and medical information at least once per year. A registration notice will be sent out at the beginning of each school year and once in the middle of the school year to remind parents to check and edit these details. Details can also be changed at any time by contacting the Admissions Officer at [admissions@slc.co.za](mailto:admissions@slc.co.za).

## **11. CONSENT**

Under Data Protection Law we are required to obtain consent to process an individual's personal data. This is with limitations and exceptions as we may have lawful and legitimate reasons to process such data to support the school's operation as an independent school or fulfil contractual or legal obligations, regardless of consent. When our school collects information about you, our school takes reasonable steps to advise you of certain matters. This includes the purpose of the collection, and how to access, update and correct information held about you. For information about students and their families, a consent form is provided to parents (or mature students) upon enrolment. In some cases, we may send out separate consent requests using:

- paper based consent forms;
- electronic consent forms;
- digital applications to obtain consent

Each new employee of Stanford Lake College will be required to sign an employment contract, including consent for the use, storage and processing of info; each new pupil of Stanford Lake College / or their parent must provide written consent for the use, storage and processing of their or their child's information upon registration.

## **12. INFORMATION SECURITY**

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We have policies, such as the IT Acceptable Use Policy around the use of technology and devices, and access to school systems. We will, on an ongoing basis, continue



to review our security control and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security
- Computer and network security
- Access to personal information
- Secure communications
- Retention and disposal of information
- Acceptable usage of personal information
- Governance and regulatory issues
- Monitoring access and usage of private information
- Investigating and reacting to security incidents

Further details pertaining to data security can be found in the school's IT Security Policy.

Upon signing employment contracts, all employees of Stanford Lake College agree to abide by the points stated under the section "CONFIDENTIALITY AND NON-DISCLOSURE", which outlines the employee's legal obligations around the protection of personal information and to the non-disclosure or improper use of any confidential information relating to the business and/or clients (learners and parents) of the School.

### **13. COMPLAINTS**

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Regulator. We request that you contact our Information Officer by email on [privacy@slc.co.za](mailto:privacy@slc.co.za) to take the necessary steps to resolve the matter before contacting the Information Regulator.

### **14. COOKIES POLICY**

The Stanford Lake College website ([www.slc.co.za](http://www.slc.co.za)) uses cookies to enhance functionality and improve the user experience. Cookies are small data files that are sent from our website to your computer or mobile phone. They are stored on the hard drive of your device. Some are stored just for the duration of your visit to the website, others are stored for much longer periods. If you'd like to learn more about cookies in general, we recommend the About Cookies website <http://www.aboutcookies.org.uk/>

The school website does not use cookies that give us access to any personal information about you. Third-party cookies are ones that are not set directly by Stanford Lake College, but they may be dropped onto your computer by a third party when you use one of our websites, or do certain things on one of our websites.

As third party cookies aren't set by us, we can't control how they work - but we can control which websites we choose to work with. We take your privacy seriously and we would never work with a website we don't trust. We use Google Analytics to help us improve our website. This analytic tool uses cookies that are not controlled by Stanford Lake College but which are active when you use many of our websites. Analytics tools help us collect information about how people in general use our websites. For instance, it helps us monitor how many people visit each page, how long people stay on each page, which search engines people use to find our website and which links are clicked on. Analytics data cannot be used to identify you, or to tell us what you did on our website. It is completely anonymous.

### **15. PRIVACY POLICY UPDATES**

Stanford Lake College will update this Privacy Policy from time to time. Any substantial changes that affect how we process your personal data will be notified on our website. If required, we will also notify you directly. This Privacy Policy should be read in conjunction with other school policies and any contract terms and conditions.

