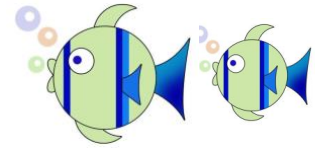


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Privacy Policy (POPI Act and PAIA) - 2021

Date Policy Written: 0107/2021

Person responsible: Michelle Vamvadelis

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Terminology, Acronyms and Abbreviations

- Biometric information – Blood type, etc
- Contact Details – Email, telephone, address, etc
- Data breach – Lost or stolen data
- Data subjects – The individual or legal entity that the personal information relates to (parents, children, suppliers)
- Data touchpoints – Obtaining updates
- Demographic information – Age, sex, race, birth date, ethnicity, etc
- ECD – Early Childhood Development
- General Data Privacy Regulations (GDPR) – Contains regulations and also clarifies certain points in the Act
- History – Employment, financial educational, criminal, medical
- Internal Security Management (“ISM”) Framework – documented planning, detailed POPIA Policy
- Juristic Person – Company, NPO, NPC, PBO, etc
- Natural Person – A living human being
- Operator – the designated person who processes the data for the Responsible Party
- Opinions of and about a person – Reports and assessments, private correspondence, etc
- Personal Information – Information on an identifiable, living, natural person or juristic person (companies, NPOs, etc)
- PI – Personal Information
- Processing – Anything done with Personal Information, i.e. collection, usage, storage, dissemination, modification and destruction
- Protection of Personal Information ACT (POPIA) – the Act
- Public or private body – Business, NPO, PBO, NPC, etc
- Responsible Party – the public or private body that is ultimately liable
- Special Personal Information – Religious beliefs, race or ethnic origin, trade union members

Aims and Intent

According to POPIA Personal Information means information relating to an identifiable, living, natural person or an identifiable juristic person (Data Subjects).

Big Fish Little Fish Montessori exists to provide a safe, developmentally appropriate environment for children aged 3 months to six years old and, as such, we require a large amount of sensitive Personal Information.

We are committed to protecting the privacy of all our Data Subjects and ensure that the Personal Information that is collected is used properly, lawfully and transparently.

The aim of this policy is to:

1. Protect the safety and privacy of our children, parents and staff.

2. Comply with the South African Protection of Personal Information Act (POPIA).
3. Protect Big Fish Little Fish Montessori from legal risks.
4. Ensure that the reputation of the preschool, its staff, and the parents are protected.
5. Ensure that any users are able to clearly distinguish that information provided on social media legitimately represents of Big Fish Little Fish Montessori.

Method

1. When designing this policy, we asked ourselves the following questions – the answers are the facts that make up this policy:
 - a. We hold vast amounts of extremely sensitive Personal Information on the children, their parents and the staff, and are we abiding by the laws which require them to protect our privacy, such as compliance with the Protection of Personal Information Act (POPIA)?
 - b. Do we have the systems in place and defence mechanisms to keep Data Subjects details secure?
 - c. Is personal information we hold safe?
2. This policy will be implemented, maintained and updated by:
 - a. Information Officer: Big Fish Little Fish Montessori represented by:

Name: Michelle Vamvadelis
Designation: Owner / Principal
Contact details: 073 250 8557
Email: BFLF@telkomsa.net

- b. Operator:

Name: Tayla Peremore
Designation: Teacher
Contact details: 083 660 2063
Email: Taylaperemore@yahoo.com

When the Operator leaves the employ of Big Fish Little Fish Montessori :

1. If they hold any personal information on their devices pertaining to our ECD center and they do not delete that information, then they become a Responsible Party and are liable for the loss of that information or a data breach.
 2. However, every employee who leaves Big Fish Little Fish Montessori will sign a Declaration confirming that they hold no Personal Information on their devices that pertain to anybody in our centre.
3. During an employee's induction he/she will be informed of the contents of this policy and sign a contract that lays out their responsibilities and obligations, and acknowledgement of their understanding and willingness to adhere to these rules.
 4. When a child is enrolled at Big Fish Little Fish Montessori the parents are informed of the contents of this policy and sign a form declining or approving the use of their children's photographs.
 5. Every effort will be made to achieve a balance between speed, efficiency and ease-of-communicating with excellent security and privacy protocols.
 6. Parents and all other data subjects have the right to ask about their data and reasonably request that be deleted. It must be considered that without certain information Big Fish Little Fish Montessori will not be able to provide an adequate service to the child or his/her parents.

Key Facts

1. Electronic devices include but are not limited to:
 - a. Emails, and
 - b. Any material that can be downloaded via the Internet, or
 - c. Sent across Big Fish Little Fish Montessori's computer network via the intranet from or to electronic equipment such as:
 - i. Desktop and laptop computers
 - ii. Disks, drives and any storage device
 - iii. Phones
 - iv. Tablets and iPads
 - v. Network servers
 - vi. Fax machines
 - vii. Any equipment with electronic storage capability
 - viii. Any recording devices
 - ix. Closed circuit television
2. To protect the interests of children, personal or private information is not included on any publicly available webpage or application.
3. Only when written permission has been received and child protection obligations met, will photos, videos and news be shared.
4. Big Fish Little Fish Montessori's Facebook page is a public page.
5. When a child is enrolled or leaves our facility, the Information Officer will remove them from, or invite them to the closed Umbilically Digital Dairy group and the WhatsApp School Notice Board.

Legislation

There are many South African and international regulations that protect the rights of children. Big Fish Little Fish Montessori adheres to all of them to the best of our ability. The Acts and regulations we follow are:

1. The South African Constitution.
2. The Children's Act.
3. The Protection of Personal Information Act.
4. General Data Protection Regulations.
5. The United National Convention on the Rights of the Child.
6. Sexual Offences Act.
7. Journalism Act.

Principles from legislation and best practice

1. Children need special protection.
2. Children are identified as "vulnerable individuals" and deserving of special protection.
3. Of note, we need to look at this particular regulation which states: "*The best interest of the child is of paramount importance and will be prioritised in all matters related to child protection*".
4. At Big Fish Little Fish Montessori we understand that:
 - a. The online world is not separate from the off-line world. There is no set of different laws that apply online. The law, which applies in our everyday lives, applies online too.
 - b. South African law is clear: when publication occurs every single person, who is directly or indirectly responsible for the publication, can be held legally liable for it.

Potential non-compliance implications for individuals and Big Fish Little Fish Montessori

1. Unnecessary financial and reputational risks.
2. Negative media publicity.

3. Loss of stakeholder confidence and trust.
4. Civil action by a data subject.
5. Fines and penalties issued by the official Government Information Regulator and/or imprisonment of up to 12 months. In certain cases the penalty for non-compliance could be a fine and/or imprisonment of up to 10 years (Section 107).
6. If you are processing information of an EU citizen a fine from the country of origin's Information Regulator can impose a fine in their currency.

Duty of Care, Ethical and Legal Obligations

Duty of care is defined as: *“a requirement that a person act toward others and the public with the watchfulness, attention, caution and prudence that a reasonable person in the circumstances would use. If a person's actions do not meet this standard of care, then the acts are considered negligent, and any damages resulting may be claimed in a lawsuit for negligence”.*

Before sharing content Big Fish Little Fish Montessori considers:

1. As we work with vulnerable young children our duty of care for their wellbeing is paramount. We bear in mind legal, ethical and moral obligations and do not post any personal details, such as their names, addresses, photos, videos and work without express written consent.
2. Privacy, confidentiality and sensitive content: If there are likely to be any privacy or confidentiality issues, or if content is of a sensitive nature we will not post it at all.
3. The Principal oversees the social media function and must ensure appropriate standards are maintained with particular focus on removing any information that may identify a child.
4. Particular consideration is given to:
 - a. Vulnerable children whose circumstances and/or personal characteristics place them at increased risk of harm when using social media.
 - b. This may include children under Court Orders where contact between a child and another person, including a family member, may be unlawful.
 - c. Links to external websites must not contravene this policy and bi-annual audits will be conducted to ensure that externally linked websites have not changed to something undesirable.

Data Subjects and Their Rights

Personal Information is collected from staff, parents and service providers. These are our Data Subjects who the right to have his or her PI processed in accordance with the conditions for lawful processing, i.e.:

1. The right to be notified that personal information is being collected about him, her or the child.
2. The right to be notified when their Personal Information has been accessed or acquired by an unauthorised person, or lost.
3. The right to establish who the Information Officer is and what controls are implemented to safeguard their PI.
4. The right to request access to his/her PI.
5. The right to request the correction, destruction or deletion of their PI.
6. The right to object on reasonable grounds to the processing and retention of their PI.
7. The right to not have their PI processed for the purpose of direct marketing.
8. The right to submit a complaint to the Information Regulator regarding the interference with or loss of their Personal Data.
9. The right to institute civil proceedings regarding interference or loss of their PI.

Lawful Processing of Personal Information

Purpose of the Processing of Personal Information and Special Personal Information

- 1. General:**
 - a. Comply with our statutory, regulatory, legal and other obligations under various Acts.
 - b. Health and safety.
 - c. Quality control.
 - d. Security.
- 2. For consumers of our services, i.e. parents and guardians of children:**
 - a. Perform duties in terms of our Admissions Contract.
 - b. Operate and manage their fee accounts any applications, agreements and/or correspondence between them and Big Fish Little Fish Montessori.
 - c. Communicate, including direct marketing, by email, SMS, letter, telephone, face-to-face, or in any other form.
 - d. Carry out market research and business analysis.
 - e. Debt recovery.
 - f. Updating information held.
 - g. Perform any reasonably required purpose for other administrative and operational functions.
 - h. To understand each child's family dynamic in order to support them their parents in times of need.
 - i. Customer service.
- 3. For potential consumers:**
 - a. Verify information.
 - b. Check credit rating.
 - c. Direct marketing.
 - d. Any other reasonable purpose as reasonably required by Big Fish Little Fish Montessori core business.
- 4. For children:**
 - a. To make, or assist in making, decisions about a child's care and education.
 - b. To form a view of each child as an individual and to identify and/or improve the service that is being provided according to their needs.
 - c. To identify areas of vulnerability in their health, immunity, mental and/or physical wellbeing.
 - d. To monitor and evaluate a child's progress through a scaffolded curriculum.
 - e. To be able to report their progress to parents and guardians from a knowledge base.
 - f. Promotion to the next class.
 - g. Comply with Children's Rights and Responsibilities.
- 5. For employees:**
 - a. Perform duties in terms of our Employment Contract.
 - b. Operate and manage any applications, agreements and/or correspondence between them and Big Fish Little Fish Montessori.
 - c. Communicate by email, SMS, letter, telephone, face-to-face, or in any other form.
 - d. Carry out business analysis.
 - e. Updating information held.
 - f. General matters relating to employees:
 - i. Pension.
 - ii. Medical aid.
 - iii. Payroll and statutory levies, i.e. PAYE, SITE and UIF.
 - iv. Disciplinary action.
 - v. Training.
 - g. Perform any reasonably required purpose for:
 - i. Other administrative and operational functions.
 - ii. Relating to their employment.
 - h. Performance Monitoring and Evaluation.
 - i. Job promotion.
 - j. Security
- 6. For employment candidates:**
 - a. Recruitment.
 - b. Verification of applicant employees' information during recruitment process.
 - c. Statutory requirements, e.g. Police Clearance, SACE registration, etc.

- d. Relating to their possible employment relationship.
- 7. For vendors, suppliers, extra-curricular providers and other businesses:**
- Verifying information and performing checks.
 - Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties.
 - Bank account details for the electronic payment of invoices.
 - Account reconciliations.
 - Complying with our regulatory and other obligations.
 - Any other reasonably required purpose relating to our core services.

Categories of Data Subjects and Personal Information and Special Personal Information

Category: Consumers and Potential, i.e. Parents and Guardians of Children	
Personal Information	Special Personal Information
<ul style="list-style-type: none"> Billing information Email address Emergency contact (if parent not available) Full Names Home and postal address Marital status. If divorced, the custody and visiting arrangements Telephone numbers 	<ul style="list-style-type: none"> Proof of Address ID number Medical aid number and main member details Occupation and place of employment Parents view on disciplining their own child at home Passport number if no SA ID Payment arrangements Race or ethnic origin

Category: Children	
Personal Information	Special Personal Information
<ul style="list-style-type: none"> Admission and Discharge Dates Age Allergies¹ Attendance Register COVID-19 Temperature Screening Register and other information Cull name Date of Birth Medications (currently being administered) Partial care require, i.e. half or full day 	<ul style="list-style-type: none"> Adoption history (if any) Birth history Child's medical history Form 22 – Reporting Suspicions of Child Abuse ID number Immunisation Records When the child's met/is meeting his/her milestones

Category: Employees and Employment Candidates	
Personal Information	Special Personal Information
<ul style="list-style-type: none"> Age Attendance Registers Date of birth Email address Emergency contacts Employment date Full name and title Gender General practitioner contact details ² Home and Postal addresses Language 	<ul style="list-style-type: none"> Any disabilities Banking details Details of payments to third parties (deductions from salary) Disciplinary and grievance records Driver's license Employment contracts Employment history Forms 29 and 30 - Police Clearances Identity number Leave records

¹ Allergies are listed as PI and not SPI because, for the purpose of possibly saving the child's life, several people in the organisation need to know which child has an allergy and to what.

² The Data Subject's general practitioner's contact details are here in case he/she is close by and it would be preferable to call them in an emergency.

<ul style="list-style-type: none"> • Marital status • Number of dependents • Qualifications, where and when obtained • Telephone numbers • Time sheets • Training records 	<ul style="list-style-type: none"> • Medical aid records • Passport number if no ID • Pension Fund records • Performance appraisals • Probation evaluations • Race or ethnic origin • References • Remuneration/salary records • SACE and CPTD registration and details • SITE registration, details and records • Tax registration, details and records • UIF registration, details and records
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Category: Vendors, Suppliers, Extra-curricular Providers and Other Business (which may include employees)	
Personal Information	Special Personal Information
<ul style="list-style-type: none"> • Contact numbers • Directors' information • E-mail address • Identity and/or company information • Information about products or services • Name and contact details of organisation • Name and title of contact in the organisation • Other information not specified, reasonably required to be processed for business operations • Postal and/or street address 	<ul style="list-style-type: none"> • Bank account details • Complaints • Employment history if extra-curricular provider • Invoices, payment receipts, statements and reconciliations • Qualifications if extra-curricular provider • Recommendations and references

Collection of Personal Information

1. We collect PI directly from the parents and staff when they provide us with personal details, i.e. the Application for Enrolment or the Application for Employment.
2. Where possible we will inform our Data Subjects when information is optional.

Collection of Non-Personal Information

When somebody visits our website collection of non-personal information takes place. This enables us to establish which pages are of most interest to our parents and gives us very useful metadata that we use to enhance visitor's experiences to our website. Nobody can be identified from this information. This includes the use of cookies.

Security of Personal Information (Data Protection)

Big Fish Little Fish Montessori is legally obliged to provide protection for the Personal Information we hold, prevent unauthorized access and use of the PI and by all means prevent loss of the information. In order to achieve this:

1. The electronic files are password protected.
2. The paper files are stored in a fire-proof, lockable cupboard situated in the office.
3. Use of PI has been document in this policy and implemented in the ECD centre. It effectively monitors access and usage of the information.
4. Access to PI has been documented in this policy and implemented in the ECD centre.
5. Our computers and networks are securely protected through Avast Premium Security, which prevents hacking, spyware and malware.
6. Adhering to governance and regulatory norms and standards.

7. Immediately reacting to and investigating security incidents.
8. Physical security, i.e.:
 - a. Access controlled gate
9. Secure communications.

Access to Personal Information

1. Parents and staff have the right to request a copy of the Personal Information we hold on them personally and their children.
 - a. Please contact the Information Operator in the office and specify which information you want.
 - b. All reasonable steps will be taken to confirm the identity of the person requesting the information.
 - c. A request for information may be charged for, in accordance with POPIA.
2. At all times we are acutely aware of children's rights to privacy and protection.
3. Data Subjects PI is used extensively by authorised staff only in our daily management.
4. Teaching practitioners have access to the child's milestones and previous assessments.
5. If permission is granted, contact details of extra-mural service providers will be shared with the parents. The parents will elect to share their contact details with the extra-mural providers, nor not.
6. Allergy information is shared with all the employees in order to keep the child safe from harm by preventing them from coming into contact with the allergen.
7. In the event that Form 22 (Allegations of Child Abuse) is used, the names and details will only be shared on a strict need-to-know basis as prescribed on the instructions on the form.
8. Monitoring and evaluation in terms of:
 - a. Children's reports and assessments (only shared with the child's parents/guardians).
 - b. Staff Performance Evaluations (only shared with the relevant management personnel and the member of staff him/herself).
9. In connection with legal proceedings, regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.
10. To assist with our business development, performance, customer satisfaction and efficiency.
11. To monitor our website usage.
12. To keep parents/guardians informed of events at our centre.
13. To perform our contractual obligations entered into between Big Fish Little Fish Montessori and staff and/or the parents/guardians of the enrolled children.
14. Where necessary to verify identities for security purposes.
15. To contact parents/guardians regarding their children.
16. To respond to queries and requests from the parents.
17. To notify parents about any changes to the service.

Disclosure of Personal Information

1. We will never share lists of personal contact details with all the parents in the class unless prior permission has been received from every Data Subject on the lists.
2. In all instances, when an incident occurs (for example, biting, pushing, hitting, etc) the name of the victim will not be shared with the perpetrator's parents, nor will the name of the perpetrator be shared with the parents of the victim, unless required to do so through legal proceedings.
3. We may disclose your information when:
 - a. We have a duty or a right to disclose it in terms of law or sector codes.
 - b. Where we believe it is necessary to protect our rights.

Updating of Personal Information

1. Parents and staff members:
 - a. Have the right to ask us to update, correct or delete their Personal Information.
 - b. All reasonable steps will be taken to verify the identity of the person who made the request.

- c. Are obliged to provide us with updated information when changes occur in their lives that affect the Personal Information we hold.
2. At the beginning of every year, we will distribute a form to parents, staff and service providers for information updates.

Retention of Personal Information

Big Fish Little Fish Montessori will retain Personal Information in compliance with POPIA and other applicable legislation and Acts. Information is retained:

1. For only as long as necessary in terms of the law.
1. In order for us to meet contractual obligations and also to provide a quality early learning experience for the children in our centre.
2. If various Acts require different retention periods, we will use the longest period.
3. When information is reasonably required, e.g. reports and assessments, we will retain these records for a longer period.
4. When required by contract.
5. Only with the consent of Data Subjects.

Deleting of Personal Information

1. If Personal Information is collected for a specific purpose it will be deleted once that purpose has been fulfilled, unless it must be kept for legitimate reasons.
2. Using the document retention times listed in the various South African Acts, we delete information from our paper files, electronic devices and backup systems.
3. Information is never kept for longer than required and is deleted securely at the correct timeframe, .e.g:
 - a. Contracts – 7 years after the staff or child has left
 - b. COVID-19 registers – 1 year from the date of the registers
 - c. Other registers – 3 years from the date of the register
 - d. Application Forms – 3 years from the date the staff or child left.

Health and Safety

1. Policies that are strictly bound by this Privacy Policy which is underpinned by many Acts:
 - a. Health and Safety.
 - b. HIV and AIDS.
 - c. Head Lice.
 - d. Child Behaviour Guidance and Discipline
 - e. Biting
 - f. Child Safety.
 - g. Children's Rights and Responsibilities.
 - h. Food and Beverage.
 - i. Outings and Excursions.

Covid-19

1. The National State of Disaster and the Disaster Management Act require employers to process PI and SPI to prevent and mitigate the spread of COVID-19 while ensuring compliance with the POPIA.
2. The Disaster Management Act requires us to screen:
 - a. Employees, children and all visitors daily for symptoms of COVID-19.
 - b. Ascertain whether they are experiencing symptoms of COVID-19.
 - c. Refer anybody who display symptoms for medical examination and testing where necessary.
3. We will sensibly determine the need to temporarily close the affected classroom or the entire facility; this will affect employees, children, parents/guardians and possibly suppliers.
4. The decision to close will in line with the:
 - a. The Department of Social Development's Standard Operating Procedures.

- b. The Department of Health's guidelines.
 - c. As detailed in our Covid-19 Prevention and Control Policy.
 - d. Will give administrative support to any contact tracing measures implemented by the Department of Health.
5. If an employee or child has been diagnosed with COVID -19 we must and will:
 - a. Inform the Department of Health.
 - b. Provide relevant information to the Department of Employment and Labour.
 - c. Provide relevant documentation to the Compensation Commissioner in the event of Occupational Diseases claim.
 - d. Investigate the mode of exposure including any control failure.
 - e. Review our risk assessment to ensure that the necessary controls and PPE requirements are in place.
 6. The type of Special Personal Information we process is below and the information is only shared with the relevant health authorities in order to mitigate a serious threat to the health of our Data Subjects.
 - a. Temperature screening
 - b. Symptoms
 - c. Test results
 - d. Co-morbidities
 - e. Contact Tracing
 - f. Third parties visiting our premises.
 7. Only minimal information will be retained.
 8. We will de-identify or delete the COVID-19 related information within six (6) of the National State of Disaster being declared over when it is gazetted.

Data Breach

In the event there is a data breach we will take the following actions:

1. Notify each parent/customer.
2. Notify the Regulator of the breach (recommended).
3. Re-collect the information.
4. Be prepared for fines from the Information Regulator and anger from your clients.

Electronic Communications, The Internet and Downloads

It is a term of the Employment Contract that employees comply with, Big Fish Little Fish Montessori's rules and with all our policies including this one for the use of its computers, the Internet and email, which are as follows:

1. Computers, networks and email systems are the property of the company. This excludes employee's own personal computer and email address.
2. Our computer systems are maintained solely for the conducting of the preschool's business.
3. The use of the Internet, Intranet and email for any other purpose may be subject to action under the disciplinary procedure.
4. All copies of messages created, sent, received or stored on our systems shall remain the property of Big Fish Little Fish Montessori. Messages on company property are not the private property of Employees and as such there should be no expectation of privacy in any circumstances.
5. The company reserves the right to access and monitor all messages created, sent, received or stored on our systems.
6. A message means one that has been created on Big Fish Little Fish Montessori's equipment, whether it has been sent, forwarded, printed or not. The contents of email messages may be disclosed internally and to third parties without further permission of the Employee and at the discretion of the Principal/owner.
7. The use of email and the Internet to create, send receive or store any material which is offensive, disruptive or infringes copyright is an offence and will be dealt with through the Disciplinary process.
8. Our policies with regard to discrimination or harassment apply fully to the Internet and emails.
9. Employees must remember:

- a. The same laws apply to email as to any other written documents and, therefore, any comments that could be regarded as defamatory, inaccurate or misleading must be avoided.
 - b. Any written documents, texts or messages that are derogatory towards staff, children and/or parents may result in the employee being disciplined.
 - c. That even when an email message is deleted it is still possible for the message to be retrieved and read. The use of passwords does not assure confidentiality and the existence of a password does not restrict Big Fish Little Fish Montessori's right to access.
10. Notwithstanding our right to retrieve and read any email messages, emails should be treated as confidential by other Employees and opened only by the intended recipient.
 11. Employees may only disclose information or messages obtained from emails to recipients authorized to have such information.
 12. All emails and downloads can contain viruses, especially email attachments with the post-fix **.scr** and **.exe**. Therefore, all downloads and email messages will be virus-checked before opening.
 13. It is an offence to load unapproved software including computer games on to Big Fish Little Fish Montessori's computers without express permission from management.
 14. The watching of illicit material or pornography during office hours is an offence and may be punishable by law.
 15. The playing of computer games and Internet gambling on- or offline when on Big Fish Little Fish Montessori's premises is an offence.
 16. All email communication between employees, parents and other stakeholders at Big Fish Little Fish Montessori must be made from our official email account.

Photographs

1. Upon enrolment parents will sign a form whereby they will either grant or deny permission for us to post photographs of their children and artworks on our selected social media platforms.
2. If the parents deny permission then we will give their child something else to do whilst the photographs are being taken. Afterwards the child will return to participate in the activity.
3. Employees taking photographs:
 - a. Employees may only take photographs of the children with permission of the Principal who will have received prior permission from the parents.
 - b. Only our official camera may be used for photographs.
 - c. Employees are forbidden from taking photographs of the children or any part of the ECD centre on their private cell phones. If they do it may result in disciplinary action.
4. Types of photographs that may be taken:
 - a. Images of children doing group activities, provided the Principal has received written authorization.
 - b. The child must be fully dressed in all pictures.
 - c. Images of the school grounds and facilities.
 - d. Images of the staff.
5. When posting images of children or their work the following rules apply:
 - a. The IO and Sub-Operators must ensure each child shown in the image has a signed consent form.
 - b. Where a photograph is taken of a group of children (eg, six children have a signed consent form on record but one has not) the image cannot be used unless consent is obtained for all the children. A smiley face/emoji may be placed over the face of the child whose parent did not consent, and if the child is unidentifiable, the photograph may be used.
 - c. Images of children on social media platforms will not include any names identifying any of the children in the image and care must be taken not to reveal personal information about the subjects.
 - d. Only text identifying our facility or class can be used and/or a description of the activity (eg, "children from Big Fish Little Fish Montessori visiting the dairy").
 - e. Only photographs with children wearing day clothing or dress up costumes are used.

- f. Parents are aware of this policy and, in their personal capacity, should be aware of the privacy and security concerns of identifying their children online.
 - g. However, if parents/guardians still choose to share pictures and identify their children on the Internet, then:
 - i. It is their right.
 - ii. Even so, we appeal to all parents/guardians not to share online images of their child which show them with other children who attend Big Fish Little Fish Montessori.
6. When posting images of children to the Internet we consider the regulations in the Acts and the potential risk factors, such as:
 - a. A child may be targeted for harmful purposes by a person who does not have that child's best interest in mind. The risk increases when an image is shared where the child's face is clearly visible or the image is coupled with personal information such as the child's name or location.
 - b. Harmful purposes include the use of the image for cyber-bullying, child pornography etc.
 - c. Images may also be used to track children e.g. for the purpose of human trafficking or in domestic disputes.
 - d. We strongly bear in mind that images may impact children negatively later on life, e.g. when they go for job interviews as adults and a search is done on their name.
 - e. We do not use unauthorised usage of images of children in our marketing. Without proper consent and protective measures we may be taken to court for using those photographs in violation of data protection legislation and special consent will be requested from the parent of the child we would like to use.
 7. We do a thorough risk assessment with the above mentioned legislation, principles and risks in mind while considering both the potential consequences for the organisation and the child.
 8. Before posting an image or using it legitimately, we use our best judgement as to whether the image may cause any harm, ridicule or emotional pain to the child – whether it is now or in the future, in hard copy or online.
 9. We refrain from using identifiable images of children.
 10. Any images that are used will be within the boundaries of this policy.
 11. Under no circumstances may visitors to Big Fish Little Fish Montessori take any photographs whilst on our premises. This includes Government Officials during their regular inspections but excludes SAPS whilst doing an investigation.
 12. When a child's image is no longer going to be used for any reason, it will be discarded in a safe way such as shredding (hard copy), and deleting a soft wile from both the computer and the "Trash" on the PC.
 13. Consent for the use of the children's images is voluntary and may be removed at any time by the parent/guardian.
 - a. If it is unavoidable to have an identifiable child in a photographs, then the child's face will be covered by a positive icon/emoji before posting, thus rendering it unidentifiable.
 - b. Photographs that portray children in a negative light (e.g. the child crying) will never be used.
 - c. Photographs that highlight a child's special need will never be used.
 - d. None of the photographs that we may legitimately use will be photoshopped or enhanced.
 - e. None of the photographs that we take will be sold. They will usually/always be shared with the parents.
 - f. When the official annual photographs are being taken, the photographer will never have unsupervised access to the children.
 - g. The photographs we keep of the children at Big Fish Little Fish Montessori are securely stored on the password protected pc of the IO and Deputy IO..
 - h. Photographs of the children are often used in the classrooms to help the children feel part of the classroom environment and to enable them to identify:
 - i. Themselves on the birthday chart.
 - ii. Their own locker.
 - iii. Their towel and/or jacket.
 - iv. Themselves on certain creative activities.
 - i. If photographs or any other data on a child is lost, our Information Regulator will inform the parents/guardians of the situation, explain how it happened and what is going to be done about it.

14. Due to the danger that the Internet poses to children, no employee may upload any images of the children enrolled in this school onto the Internet or any social media platforms unless with prior consent from the IO.

Social Media

1. Big Fish Little Fish Montessori uses social media websites and applications as a means of communicating and sharing information about the facility and educational programs with families and the community. Specifically we use:
 - a. Facebook and Messenger
 - b. Mailchimp
 - c. LinkedIn
 - d. Instagram
 - e. WhatsApp
 - f. Umbilically Digital Diary App
2. Our social media accounts are additional communication tools and used to:
 - a. Promote our events.
 - b. Update parents on staff training and development.
 - c. Give tips on activities the children enjoyed and home learning ideas.
 - d. Give news.
 - e. Display photographs of activities, trips, special events and projects.
3. An Information Officer has been appointed. She is:
 - a. Responsible for updating the page with relevant information about the centre.
 - b. Uploading photos of the educational program using only photographs that conform to the rules listed under "Photographs and the Internet" in this policy.
 - c. Promoting our events.
 - d. Responding to questions from the local community.
 - e. Creating links to our website or other relevant websites.
 - f. Moderating our social media audiences.
 - g. Moderating or removing any comments deemed to be unacceptable or inappropriate.
4. When providing information on social media on behalf of Big Fish Little Fish Montessori the IO will:
 - a. Be familiar with the social networks and how they function.
 - b. Have an understanding of the code of conduct and ethical/professional behaviours of our preschool and the ECD sector.
 - c. Have the authority, knowledge and insights to respond to feedback and inquiries.
 - d. Use good judgement to know when to seek advice from others (eg, about content of response, how to respond or legal/ethical advice).
 - e. Know when to escalate the matter to the Information Officer for a response.
 - f. Be confident in uploading or linking to files and know how to link to other online content (eg, web pages, videos, images).
 - g. Be aware of the specific social media channels and etiquette and understand the views and feelings of our direct community.
 - h. Ensure all posts published are respectful of all individuals and communities.
 - i. Be respectful and professional in their duty of care and when communicating and referring to children, parents/guardians and their families.
 - j. Not publish any material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, or is otherwise unlawful.
 - k. Ensure that all content published is accurate, not misleading and complies with these privacy guidelines.
 - l. Respect privacy, financial disclosure and other applicable laws when publishing on social media platforms.
 - m. Respect copyright laws and attribute work to the original source wherever possible.
 - n. When posting on behalf of Big Fish Little Fish Montessori, only offer information, support or comment on topics that fall within our area of responsibility.

- o. Ensure all information posted or comments made on government policy are appropriate, remain politically neutral and does not breach any confidentiality guidelines.
 - p. Unless specifically given permission to do so, it is not the policy of Big Fish Little Fish Montessori to be the first to make a significant announcement.
 - q. Will not use government branding.
 - r. Protects personal details rigorously to ensure that the identity of children, families, staff members and other parties remain confidential.
 - s. Undertake social media training when requested to do so.
5. All staff are aware that their responsibilities under SACE's Code of Ethics for Educators also applies when using social media.
 6. The same principles apply to online comment as to any other kind of public comment, however, there are some additional considerations that apply to online participation:
 - a. The speed and reach of online communication means that comments posted online are available immediately to a wide audience.
 - b. Material posted online effectively lasts forever and is not private, may be replicated endlessly, and may be shared with recipients who we never expected to see it, or who may view it out of context.
 7. Upon enrolment families will be informed of the Electronic Communications Social Media Policy and will be asked to sign a "permission to use likeness, image, voice, performance and/ or creative work of children" form.
 8. Absolutely no personal information about any of the children appears on our official social media platforms.

WhatsApp and Other Digital Communication Platforms

Big Fish Little Fish Montessori center uses WhatsApp to communicate and as such, staff and parents' telephone numbers are readily accessible to people on the respective groups. In this instance, we consider these personal telephone numbers to be "essential" information which is used solely for the purpose of these communications.

Personal Use Of Social Media

1. Big Fish Little Fish Montessori supports staff who choose to use social media in their capacity as private individuals, however, they should be aware that content published on social media sites is publicly available even on their personal accounts.
2. Educators and other staff may be held accountable for their actions outside of business hours and staff should ensure:
 - a. They are mindful that their behaviour is still bound by the Code of Ethics, even outside work hours.
 - b. Not to make comments that are obscene, defamatory, threatening, harassing, discriminatory or hateful to or about your work or about another person or entity.
 - c. Not make comments that could be perceived to be:
 - i. Made on behalf of Big Fish Little Fish Montessori. Comments must be an expression of the employee's personal view.
 - ii. So harsh or extreme in your criticism of Big Fish Little Fish Montessori that questions are raised about your capacity to work professionally, efficiently and/or impartially thereby compromising the staff member's capacity to fulfil their duties in an unbiased manner.
 1. This applies particularly where comment is made about policies and programmes in our ECD centre.
 - d. So strong in your criticism of Big Fish Little Fish Montessori administration that it could seriously disrupt the workplace – employees are encouraged to rather resolve concerns by using the Grievance procedures.
 - e. Any gratuitous personal attack connected with your employment.
 - f. Criticism of Big Fish Little Fish Montessori's children, families and other stakeholders.

- g. Compromise the public's confidence in Big Fish Little Fish Montessori.
- 3. Where staff participate in a discussion not related to their work but that draws on their expertise in a field, such as child development, teaching or education, this is considered personal use.
- 4. Staff should not reveal information about Big Fish Little Fish Montessori that isn't publicly available.
- 5. It is not appropriate to make connections with everyone who follows your posts.
- 6. Be professional, use good judgment and be accurate and honest in communications. Errors, omissions or unprofessional language or behaviour will reflect poorly on the employee and Big Fish Little Fish Montessori and may result in the disciplinary process and termination of employment.
- 7. In order to maintain professional boundaries, staff should not accept or initiate personal invitations to be friends on social media from parents at Big Fish Little Fish Montessori unless they know them in a personal
- 8. Do not 'friend', 'follow' or subscribe to posts from under- aged children.
- 9. Be aware that some people create accounts for spam – block or report these accounts.
- 10. Staff must not mention any names of children, parents and staff of Big Fish Little Fish Montessori on their online profile without express written consent.
- 11. Staff may not publish photos of the children on their personal online profiles.
- 12. Staff may not access social networking sites during their working hours.
- 13. All staff should be cautious and mindful when accepting friend requests from co-workers.
- 14. Staff members are encouraged to set their online profiles to private so that only friends are able to see the information.
- 15. Big Fish Little Fish Montessori's logo may not be used on any staff member's any personal social media.
- 16. Any breaches of the Social Media Policy could result in disciplinary action.
- 17. Staff are also advised to consider the reputation of the school in any posts or comments related to their employment with the school on any social media accounts.
- 18. Staff must be mindful that everything posted online is public, even with the strictest privacy settings.
- 19. Assume that everything is permanent and may be shared!

Inappropriate Content

- 1. Inappropriate content includes any content that could be seen as:
 - a. Pornographic, obscene or offensive.
 - b. Harassment (racial, religious, sexual orientation physical characteristics, gender, ability, disability, economic status).
 - c. Impersonating by using another person's online profile to access social networking.
 - d. Intimidation or threatening behaviour.
- 2. The aim of social media is to promote conversation and the Social Media Administrator will remove content that is:
 - a. Abusive, offensive in nature or contains offensive language.
 - b. Bullying, harassing, defaming or giving offence to other people.
 - c. Contains personal and/or cultural attacks or insults.
 - d. Promotes hate of any kind.
 - e. Is potentially libellous or defamatory.
 - f. Off-topic or spam.
 - g. Plagiarised material.
 - h. Commercial/advertising.
- 3. Records will be kept on content that has been removed. A hard and/or soft copy will be kept.
- 4. If any member of staff notices inappropriate or unlawful online content relating to any person associated with Big Fish Little Fish Montessori, they must report it to the Information Officer or the Deputy Information Officer.
- 5. This person will report the inappropriate content to one or more of the following bodies:
 - a. Cybercrime.org.za: [cybercrime.org.za/docs/Advisory_on_Reporting_Cybercrimes](https://www.cybercrime.org.za/docs/Advisory_on_Reporting_Cybercrimes)
 - b. SAPS:
 - i. childprotect@saps.org.za
 - ii. SAPS Crime Stop (Tip-off Line): 0860 010 111

- c. Childline:
 - i. 08000 55 555
 - ii. www.childlinesa.org.za
- d. Crime Line: www.crimeline.co.za
- e. Film & Publications Board: www.fpbprochild.org.za

CCTV Surveillance System

1. Big Fish Little Fish Montessori has a CCTV surveillance system installed.
2. Images are monitored and recorded and will be used in strict accordance with this policy.
3. Information Officer is responsible for the operation of the system and for ensuring compliance with this policy.
4. CCTV digital images, if they show a recognisable person, are Personal Data and are covered by the POPI Act.
5. The system comprises:
 - a. 7x fixed position cameras inside.
 - b. 5x fixed position cameras outside
 - c. 1 x monitor located in the office
 - d. 1 x digital recorder.
6. There are no hidden cameras.
7. Every effort has been made to ensure maximum effectiveness of the system, however, it is not possible to guarantee that the system will detect every incident that takes place within the area of coverage.

Purpose of the system

1. The primary purpose of our CCTV system is to:
 - a. Ensure the safety and security of the children, staff, parents and visitors consistent with respecting the individual's right to privacy.
 - b. To have a digital record of any accidents/incidents.
 - c. Protect our property and equipment.
2. These purposes will be achieved by monitoring the system to:
 - a. Observing classroom behaviour.
 - b. Assist in the prevention and detection of crime.

CCTV Information Processing

1. The system will not be used to provide recorded images for the Internet, nor to provide images for any third party, other than the South African Police in the course of their enquiries.
2. The cameras record every day for 24 hours and are motion activated.
3. Recordings are made using a digital video recorder operating in real time mode.
4. Recordings will normally be retained for 7 days from the date of recording, and then automatically be overwritten.
5. Images captured by the system will be monitored on our premises.
6. It is recognised that images are sensitive material and subject to the provisions of the POPI Act. Our Information Regulator is responsible for ensuring day to day compliance with the Act. All data recordings will be handled in strict accordance with this policy.
7. Video clips of accidents/incidents will be stored indefinitely.
8. Access to recordings will be restricted to our Information Regulator.
9. Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:
 - a. Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder.

- b. People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
 - c. Emergency services in connection with the investigation of an accident.
10. No staff member, parent or visitor will have instant access to the CCTV digital images/recordings as, if they show a recognisable person as these recordings, it will be deemed Personal Data and covered by POPI.
- a. A person whose image has been recorded, or the parents of a child who's image has been recorded and retained, may apply for access in writing to our Information Regulator.
 - b. If the Information Regulator deems it appropriate arrangements will be made for the viewing of the recording/images and subsequent discussions about the content.
 - c. The POPI Act gives the Information Regulator the right to refuse a request for a copy of the data, particularly where such access:
 - i. Could jeopardise the privacy of a child.
 - ii. Could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.
 - d. If it is decided that a data subject access request will not be complied with, the reasons will be fully documented and the data subject informed, whenever possible in writing, stating the reasons.

Technology and Apps

Apps

1. Big Fish Little Fish Montessori uses the Umbilically App for communication with parents. It is guaranteed by the Developer:
 - a. To be highly secure and fully POPIA compliant.
 - b. Fully integrate the school administration system, the financial management facility, and the digital / online communication platforms.
 - c. We rigorously maintain our app in order to keep the security intact and the information up to date and protected.
2. WhatsApp for communication between class practitioners-parents, principal-staff, principal-parents
 - a. Practitioners and parents sign their agreement to go onto WhatsApp groups in their respective contracts, i.e. Employment Agreement or Admissions Agreement.
 - b. Parents and practitioners are sent an invitation link to WhatsApp groups rather than being added by the group admin.

Software and Computers

1. 1 x Principal's laptop
2. 1 x Office Administrator Laptop
3. 1 x Staff Desktop for lesson plan research
4. 2 x iPhones:
 - a. 1 x Principal
 - b. 1 x School
5. Accounting software
6. Microsoft Office Suite

Internal POPI Act Complaints Procedure

1. Any person may submit a complaint alleging interference with the protection of PI ,SPI or data to the Information Officer:
 - a. In the prescribed manner.
 - b. In writing with supporting documentation
2. The IO will:
 - a. Acknowledge receipt of the complaint in writing within three business days of receipt.
 - b. Give the Complainant the name and contact details for the team responsible for investigating the complaint.
 - c. Record the contents of the complaint in the Complaints Register (maintained for five years).
 - d. Investigate the complaint herself or appoint a team to do so.
3. The IO and/or team will determine whether the complaint can be resolved immediately. If it can, the team will take the necessary action and inform the Complainant immediately.
4. If the complaint is of a serious nature and cannot be resolved immediately the team will send the complainant a written summary of the steps to be taken to resolve the matter and the expected date of resolution.
5. If unable to resolve the complaint within 3 weeks of logging the complaint in the Complaints Register, the team will notify the Complainant by means of a written notice that will outline the current status of the complaint and the expected date of resolution.
6. If unable to resolve the complaint within a further 3 weeks of the written acknowledgement (now 6 weeks since complaint was logged), the team will notify the Complainant in writing, giving:
 - a. Full reasons as to why the outcome was not favourable or resolved.
 - b. Advise the complainant of their right to seek legal redress by referring the complaint to the Regulator and provide the The Information Regulator's address and other contact details.
7. The team working on the complaint must:
 - a. Keep the Complaints Register updated with all actions taken and the date thereof.
 - b. Keep the Information Officer up to date with the investigation.

This policy was adopted and signed on 01/07/2021 at 11 Marlborough Way, Parklands, 7441 and is in full force and effect at Big Fish Little Fish Montessori. Where necessary all the parents have been informed of this policy. All our employees have a good understanding of the contents of this policy and if at any time any of the clauses in this policy are contravened, normal disciplinary sanctions, as per the Basic Conditions of Employment Act, will be taken.

Name and Signature : Owner / Principal:

Annexure A – Form 1 for the Objection to the Processing of Personal Information

12 No. 42110

GOVERNMENT GAZETTE, 14 DECEMBER 2018

FORM 1 OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Annexure B – Form 2 Request for Correction or Deletion of Personal Information

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number/E-mail address:	
	Code ()
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
Contact number(s):	
	Code ()

Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at this day of20.....

.....
Signature of data subject/ designated person

Annexure C – Form 5 Complaint Alleging Interference with Personal Information

FORM 5

COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION/COMPLAINT REGARDING DETERMINATION OF AN ADJUDICATOR IN TERMS OF SECTION 74 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 7]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

Complaint regarding:

Alleged interference with the protection of personal information

Determination of an adjudicator.

PART I	ALLEGED INTERFERENCE WITH THE PROTECTION OF THE PERSONAL INFORMATION IN TERMS OF SECTION 74(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (Act No. 4 of 2013)
A	PARTICULARS OF COMPLAINANT
Name(s) and surname / registered name of data subject:	
Unique Identifier/Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address :	

Name(s) and surname of responsible party /registered name:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR COMPLAINT <i>(Please provide detailed reasons for the grievance)</i>

Signed at this day of20.....

.....
Signature of data subject/ designated person

Name(s) and surname of responsible party /registered name:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR COMPLAINT <i>(Please provide detailed reasons for the grievance)</i>

Signed at this day of20.....

.....
Signature of data subject/ designated person