

PRIVACY POLICY

INTRODUCTION

Grace College views data protection in a serious manner and are committed to protecting the privacy of all of its stakeholders. The School is committed to ensuring that your Personal Information is connected, processed and destroyed in a transparent and lawful manner. In this Policy we lay out the use of personal information in our organisation in accordance with the requirements laid out in the Protection of Personal Information Act (POPI)

PURPOSE

Grace College is committed to adhering to the requirements laid out in the POPI Act. It serves to provide our stakeholders with detailed information with regards to the use of their Personal Information within our School. Our employees are required to process, store and destroy Personal Information in a secure, transparent and lawful manner as presented in the POPI Act.

SCOPE OF THE POLICY

This policy and procedure applies to all employees, parents, pupils and third party service providers of Grace College.

COLLECTION OF PERSONAL INFORMATION

Grace College collects personal information for various organizational and lawful processes. Personal Information will only be processed for the reason for which it was collected. Grace College will process such information in a transparent, secure and lawful manner that does not impede on the privacy of the Data Subject or organisation. The School and its employees will undertake the principle of minimality and only process information that is necessary; The School and its employees undertakes to obtain written consent (including email), wherever possible for the collection and processing of Personal Information; Personal Information will be collected directly from the data subject (in the case of minors, consent will be obtained by a parent/guardian).

TYPES OF PERSONAL DATA WE COLLECT AND PROCESS

We collect and process Personal information with regards to prospective families, current pupils, parents and Grace College alumni; staff, suppliers and contractors; board members, donors and benefactors and other individuals connected to or visiting our Campus.

This personal Information includes:

Personal information of individuals or companies

Video and photographic images

CCTV footage

PURPOSE FOR WHICH WE PROCESS PERSONAL INFORMATION

The School processes Personal Information to lawfully and legitimately support the school's operation as an independent school.

Our school collects Personal Information about pupils and their families when necessary to:

- Process applications of prospective pupils.
- To fulfil legal requirements
- provide a safe and secure school environment.
- Provide learners with quality education.
- Provide references for current and past learners.
- Administer learners' entries into third party assessments and the IEB.
- Learner's progress and reports.
- provide appropriate pastoral care, support pupils' social and emotional wellbeing, and health.
- support operational management of the school including administration of pupil records.
- the administration of invoices, fees and accounts.
- Management of the Grace College Campus.
- Health and Safety on the Grace College Campus (Including CCTV).
- the administration and implementation of the school's rules and policies for learners and staff.
- the maintenance of historic archives and other operational purposes.
- make reasonable adjustments and support for pupils with special needs.
- communicate with parents about pupils' schooling matters and celebrate the efforts and achievements of pupils.
- maintain the good order and management of the school.
- Use of images to promote Grace College on our Social Media, Newsletter, The School magazine and the School website.
- Use of articles and images for promotion through local publications.
- and promote the school in local publications to celebrate the efforts and achievements of learners.

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

- Staff recruitment
- the administration of staff records
- contractor administration
- Staff HR Matters
- staff appraisals; disciplinary procedures;
- Staff References

PROCESSING/DISCLOSURE AND COMMUNICATION

Grace College will only process Personal Information for the sole purpose of the Schools activities and objectives, including Alumni relationship management.

Personal information will be processed under the following circumstances:

- Third party service providers who deliver a service to the Grace College community
- To fulfil legal requirements
- Historical Archiving
- Where such disclosure matches the legitimate purposes associated with each of the persons and organisations described above;
- Further processing, if lawfully warranted, will only be carried out where it is compatible with the original purpose of collection.

In the context of providing education, information relating thereto, and alumni related activities, the School needs to employ the techniques afforded by modern electronic communication such as, but not limited to, specialist database platforms, bulk e-mails as well as other similar e-notification methodologies, and social media.

INFORMATION SECURITY

Grace College is obliged to provide adequate protection for the Personal Information we hold and take reasonable steps to prevent unauthorized access or disclosure of such information. Policies are in place around the use of technology and devices, and access to school systems, for both our pupils and staff.

We will, on an ongoing basis, continue to review our security control and related processes to ensure that your Personal Information. remains secure.

To improve the Security of information in our organisation, the following procedures have been put in place.

- Limiting the access and number of databases where Personal Information is stored.
- Reducing the number of hard-copy records kept on campus;
- Limiting access to hard-copy records and monitoring the access thereof;

Instituting and maintaining a variety of electronic safeguards which include:

- Firewalls
- Password protection
- Limit controlled Cloud Storage
- Safely Shredding documents no longer needed.
- Employing physical barriers such as locks and access control mechanisms
- Installation of security cameras to monitor access

YOUR RIGHTS

In terms of the POPIA act you have the right to:

- access and understand the Personal Information we hold about you;
- access and understand the Personal Information data we hold about your child/children;
- ask for the Personal Information we hold about you and/or your child/children to be erased or amended (this is with limitations and exceptions as we may have lawful reason to hold such PI)
- withdraw consent to process your PI or your child/children's PI (this is with limitations and exceptions as we may have lawful reason to process such PI regardless of consent)

For any queries regarding your personal information, please contact us in writing or email specifying the information you require. Please note that any such access request may be subject to a payment of a legally allowable fee.

We request that you regularly update us, in writing, of any changes to your Personal Information so we may amend our records accordingly.

INFORMATION BREACHES

When a data breach has been identified, Grace College will notify all of the relevant parties & data subjects as guided by S22 of the POPI Act. Measures will be taken to secure the area in which the data breach occurred to avoid any further incidents. Handling data breaches in an efficient manner will manage the negative impact on the organization.

TRANS-BORDER INFORMATION FLOWS

The following types of activity give rise to trans-border Personal Information flows in accordance with the specified purpose of the School. These include, but are not limited to:

- Enrolled pupils who are residents of another country
- Alumni who reside outside of South Africa
- Providing information to universities outside of South Africa for enrolment purposes.
- The intention of pupils to enrol at educational institutions outside South Africa and where the provision of PI is necessary to facilitate enrolment
- Pupils applying for Exchange, President Award travel or any College trip outside South Africa

COOKIES POLICY

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