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## CHSA LEARNER PRIVACY NOTICE

### INFORMATION RECORDS POLICY FOR LEARNER/ADMISSIONS

#### 1. Introduction

Christel House South Africa (CHSA) records and shares information about its learners and their families (data subjects) to help improve the Christel House experience for everyone. The use and sharing of this information are done in line with the eight information processing principles outlined in the Protection of Personal Information Act (POPIA) (2013).

The eight information processing principles are: *Accountability, Processing limitation, Purpose specification, Further processing limitation, Information quality, Openness, Security safeguards, Data Participation.*

These information processing principles are present throughout this policy and special care has been taken to make sure that CHSA follows each principle closely. This policy will be emailed to you and be made available during the first phase of the admissions process.

##### 1.1. Why are we giving this to you?

As your school we need to use information about your child for several reasons. This policy tells you what information we use about your child and why we use it. It is important that CHSA keeps the information about your child safe. This policy will also explain how CHSA keeps this information safe.

##### 1.2. Policy Statement

We acknowledge that parents/guardians have the right to know that the information which they share with CHSA will be treated as confidential. Parents/guardians also have the right to be informed about when, how, and why CHSA must use and sometimes share this information.

The Protection of Personal Information Act (POPIA) was introduced to make sure that companies and organisations take care of the personal information that they collect and use. CHSA has a duty to comply with the regulations set out in POPIA and has made all the necessary changes to do so.

During your child's time at Christel House South Africa, we will use information that we gather in relation to your child and you as a parent/guardian for different purposes. Information that we capture about you and your child is known as '**personal information**'. Some of the information that we capture will fall into another category of personal information called '**special personal information**'. Special personal information needs extra care to make sure that it is kept safe. All minors (persons under the age of 18) personal information is regarded as special personal information.

When your child leaves the school, we may need to hold the information we captured about you and your child for some time. Whenever we use the information which we captured, it is called 'processing'.

This policy will explain what personal information and what special personal information we hold about you and your child, why we process the information, who we share the information with, and your rights regarding this data processed by us.

## 2. Information Collected

### 2.1.1. What information do we use about your child?

We will collect, hold, share and use the following special personal information about your child for educational and welfare. We will also take extra care with this information to make sure it is being kept safe.

Full name	Date of birth	Race
Physical address	Academic results	Gender
Emotional and social behaviour	Health information	Religion
Contact numbers	External reports	Language
Passport/birth certificate number	Student number	Disciplinary records
Family dynamics	Pictures (CCTV footage), School Portfolio picture	(If consented to) Other Pictures from: Events, Workshops, Awards Ceremonies.

### 2.1.2. Why do we use this information about your child?

We use this special personal information about your child for many reasons, including:

- To provide your child with a good education and support system.
- To be able to address and support any educational, health or social needs that your child may have.
- To provide a safe learning environment for everyone involved.
- To deal with emergencies involving your child.
- To know where to pick your child up for school and drop off at home.
- To report and celebrate your child's achievements.
- To help you as parents/guardians through reports and additional information.
- Pictures for newsletters (if consented to) which keep you updated on what is happening at Christel House.
- Pictures for marketing and fundraising (if consented to) – we use these pictures when trying to raise more funds so that we can provide your child and others with the best possible education and support.

### 2.2.1. What information do we use about you as a parent/guardian?

We will collect, hold, share and use the following personal information about you for educational and welfare purposes.

Name and Surname	Physical address	Contact details
Income details	ID Number	Gender
Employment history	Marital Status	Family demographics/dynamics
Pictures (CCTV footage)	(If consented to) Other Pictures from: Events, Workshops, Awards Ceremonies.	

We will also collect, hold, share and use the following special personal information about you for educational and welfare. We will also take extra care with this information to make sure it is being kept safe.

Emotional and social behaviour	Health Information (Physical/Psychological)	Social Ills (substance use, neglect)
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**2.2.2. Why do we use Personal Information and Special Personal Information about you as a parent/guardian?**

- To be able to contact you about your child.
- To approve stipend allocations.
- For self-sufficiency tracking – making sure that money is being used well.
- To help your child apply for bursaries.
- To help your child apply to universities and colleges, job and learnership opportunities.
- We need to understand your family’s dynamics for therapeutic intervention/counselling.
- We need to know of any medical issues in the family to help us give your child the proper medical treatment.
- We use information about family backgrounds for marketing and fundraising by showing the difference that Christel House makes in families lives.
- Pictures for newsletters (if consented to) which keep you updated on what is happening at Christel House.
- Pictures for marketing and fundraising (if consented to) – we use these pictures when trying to raise more funds so that we can provide your child and others with the best possible education and support.

**2.3. Where do we get this information from?**

We get this information from:

- Parents/guardians
- Other schools
- Teachers and other staff such as Social Services
- People from other organisations, like doctors or the local authority for example.

CHSA will do its best to ensure that the information we collect is correct and up to date.

**3. Personal Information Storage and Sharing**

**3.1. How long will we keep information about your child?**

CHSA will hold information about your child for only as long as it is necessary. How long depends on the type of information and CHSA’s use of the information. We hold some types of information so that we can keep track of what past students are doing and show that CHSA is making a difference. Where possible, CHSA will de-identify information. This means that we will remove the personally identifiable information in a way that it cannot be remade.

**3.2. Who will we share your child’s information with?**

We may share information about your child with:

- Other schools: if your child leaves Christel House for another school we need to share your child’s learner profile with the new school so that they can fulfil their responsibilities with regards to your child’s education.
- The Western Cape Education Department: This is required by law.
- To our donors who support Christel House
- On our website and in newsletters.

We also need to share confidential information without your permission if it is in the public’s interest. This means if it is to prevent a crime from happening or to stop one that is busy happening, or to prevent harm to a child or adult.

**3.3. Cross-border transfer of personal information**

Sometimes CHSA will have to transfer your (or your child’s) personal information outside of South Africa for the purposes discussed in Section 2.1.2. and 2.2.2. We will make sure that the country we send the personal information will have similar levels of information protection laws.

**3.4. Keeping this information safe**

To keep this information safe, it is important that only the people who need to use the information can see it. This is done by:

- Managing access by only allowing authorised school staff to view certain information.
- Having strict security around the information. This includes the physical hard copies of information, and the information kept on our devices.

**4. Your rights in relation to your and your child’s data**

You have the right to ask to see what information we have about you or your child. If you want to do this, please contact the CHSA’s Information Officer or Deputy Information Officer:

- Adri Marais (Information Officer): [amarais@sa.christelhouse.org](mailto:amarais@sa.christelhouse.org)
- Shereen La Fleur (Deputy Information Officer): [slafleur@sa.christelhouse.org](mailto:slafleur@sa.christelhouse.org)

You also have the right to:

- Object to the use of your information or your child’s information if you believe that is wrongly being used.
- Ask for incorrect or outdated information to be corrected.
- Unconsent to previously consented processing of personal information at any time.

After contacting CHSA with your concerns, if you still feel unsatisfied you can contact the national Information Regulator at <https://justice.gov.za/inforeg/>.

Parent / Legal guardian Name.....

Signature: .....

Date: .....

Full Name of Child: .....

Grade: .....