



# Brebner High School

P.O. BOX 28703 DANHOF 9310 ☎ (051) 436 2267 FAX. (051) 436 4791  
E-Mail: [headmaster@brebnerhigh.co.za](mailto:headmaster@brebnerhigh.co.za)

## **POLICY MANUAL FOR THE PROTECTION OF PERSONAL INFORMATION AND THE RETENTION OF DOCUMENTS AND RECORDS IN TERMS OF POPIA. (Revised 2024)**

### **1. PREAMBLE**

- 1.1. POPIA is not intended to prevent the processing of personal information but to ensure that it is done fairly and without adversely affecting the rights of data subjects. Given the wide-ranging impact of the POPIA, it is expressly provided that all processing of personal information must conform to the POPIA's provisions.
- 1.2. Brebner High School is a public school in terms of the South African Schools Act 84 of 1996 (as amended) and is managed and governed in terms of the provisions of the act as well as the language and admissions policy drafted in terms thereof. The medium of instruction at the school is English. The school offers education in grades 8 to 12.
- 1.3. A person's right to privacy entails having control over his or her personal information and being able to conduct his or her affairs relatively free from unwanted intrusions. Given the importance of privacy, the School is committed to effectively managing personal information in accordance with POPIA's provisions.
- 1.4. POPIA establishes the rights and duties that are designed to safeguard personal data in terms of POPIA, the legitimate needs of the School to collect and use personal data for its business and other purposes are balanced against the right of data subjects to have their right of privacy, in the form of their personal details, respected.
- 1.5. The school regards the lawful and appropriate processing of all Personal Information as crucial to successful service delivery and essential to maintaining confidence between the School and those persons also known as a data subject in terms of POPI and entities/agencies/businesses/persons who deal with the School. The school therefore fully endorses and adheres to the principles of the Protection of Personal Information Act, Act 4 of 2013 (POPIA) and the regulations promulgated in terms of the Act.
- 1.6. Data (including information and knowledge) is essential to the administrative business of the school. In collecting personal data all staff has a responsibility to use it both effectively and ethically. There is a balance to be struck between an individual's right to privacy and the legitimate business requirements of the School. Therefore, it is critical that all staff in the Schoolwork to the highest attainable standards with regard to this Policy Manual and the prescripts of POPIA and other related legislation and policies. The School's integrity includes both the way in which staff conduct themselves and the way in which all ensure the data the school hold is compliant with relevant legislation.
- 1.7. Details of the School:  
P.O. Box 28703, Danhof 9310  
Limousine Street, Helicon Heights, BFN  
Tel: 051-4362267  
[headmaster@brebnerhigh.co.za](mailto:headmaster@brebnerhigh.co.za)  
Information officer (Principal): Mrs Elbie Roberson. She can be contacted in writing at: [headmaster@brebnerhigh.co.za](mailto:headmaster@brebnerhigh.co.za)  
Deputy Information officer (Deputy Principal): Mrs Riette Lackey. She can be contacted in writing at: [riettelackey@gmail.com](mailto:riettelackey@gmail.com)



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## 2. OBJECTIVES OF THE POLICY MANUAL

- 2.1. To safeguard the personal information held by the school from threats, whether internally or externally, deliberate or accidental and thus protecting the right of privacy of all Data Subjects as listed in the **Annexure A** of this policy.
- 2.2. Protecting the School's records and information as listed in Annexure A in order to ensure the continuation of the day to day running of the school.
- 2.3. Regulating the manner in which personal information is processed by the school and stipulates the purpose for which information collected is used.
- 2.4. Appointing Information Officers to ensure respect for and to promote, enforce and fulfil the rights of Data Subjects referred to in **Annexure A**.
- 2.5. To protect the School from the compliance risks associated with the protection of personal information which includes:
  - a. Breaches of confidentiality where the School could suffer a loss in revenue where it is found that the personal information of data subjects has been shared or disclosed inappropriately.
  - b. Failing to offer a choice, including the choice where all data subjects should be free to decide how and for what purpose the School may use information relating to them.
  - c. Any instances of any reputational damage where the School could suffer a decline in its reputation, or its good name is impugned through the actions of another party who disseminates or has gained unauthorised access to any personal information of the school's data subjects.

## 3. APPLICATION AND SCOPE OF THE POLICY

- 3.1. At Brebner High School we are committed to protecting the privacy of data subjects and to ensure that their personal information is collected and used properly, lawfully and transparently.
- 3.2. The SGB and the Principal of the school are ultimately responsible for ensuring that information security is properly managed. The Information Officer, (name), is responsible for:
  - a. The development and upkeep of this policy.
  - b. Ensuring this policy is supported by appropriate documentation, such as procedural instructions.
  - c. Ensuring that documentation is relevant and kept up to date.
  - d. Ensuring this policy and subsequent updates are communicated to the SGB, staff and parents where applicable.
  - e. The school governing body, the school's employees, volunteers, contractors, suppliers and any other persons acting on behalf of the school are required to familiarise themselves with the policy's requirements and undertake to comply with the stated processes and procedures.
  - f. Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities of their particular areas of responsibility overseen by the information officers of the school.
- 3.3. The Information Officers and staff are responsible for adhering to this policy, and for reporting any security breaches or incidents to the Information Officer.



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- 3.4.** This Policy Manual applies to all staff of the School, both permanent and temporary staff, to staff working on a contract basis for the School, coaches, volunteers and others who are authorised to access personal data held by the School. The provisions of the Policy are applicable to both on and off-site processing of personal information. Non-compliance with this policy may result in disciplinary action and possible termination of employment or mandate, where applicable.
- 3.5.** This policy applies to personal information collected by the School in connection with the services it offers. This includes information collected offline through the school's telephone lines and online through the school's websites, branded pages on third-party platforms and applications accessed or used through such websites or third-party platforms which are operated by or on behalf of the School. This policy is hereby incorporated into and forms part of the terms and conditions of use of the applicable School web sites and other social media platforms.
- 3.6.** Line managers within the School are required to ensure that all staff who manage or have access to personal data comply with this Policy Manual. The SGB and Members of the SMT are required to review procedures in their areas to ensure compliance with this Policy Manual and POPIA as part of the annual planning process of the School.
- 3.7.** This policy does not apply to:
- information collected by third party websites, platforms and/or applications ("Third Party Sites") which the school/SGB/SMT does not control;
  - information collected by Third-Party Sites which a person can access via links on school sites; or
  - banners, competitions and other advertisements, services, or promotions on Third Party Sites that the School may sponsor or participate in or just host advertisements for.
  - Information for purely household activities;
  - Which has been de-identified;
  - Which has been processed by or on behalf of another public body for the purposes of:
    - Safeguarding national security;
    - The investigation and prosecution of criminal matters;
    - Processed by the Cabinet and its Committees or the Executive Council of a province;
    - Relating to the judicial functions of a court.
  - The processing of personal information for the purposes of journalistic expression in defined circumstances;
  - The exclusion requires the journalist to be subject to a Code of Ethics and provides adequate safeguards for the protection of personal information.
- It is important to note that the exclusions referred to above related to the processing by or on behalf of a public body for the purposes of national security and investigation of a crime are only granted to the State if adequate safeguards have been established in the legislation permitting the process of such information.
- 3.8.** This policy impacts upon the School's work practices and data processing for all those who:
- create records including electronic records;
  - have access to records;



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- c. have any other responsibilities for records, for example, storage and maintenance responsibilities;
- d. have a management responsibility for staff engaged in any the activities as stipulated in the policy.

## 4. POLICY STATEMENTS

### 4.1. Key Principles of the Policy Manual

4.1.1. Unfortunately, POPI is not an event, in essence, it requires a change in school culture with regard to information management and a concerted and directed effort. POPIA Compliance requires at least the following:

- a. Will from management.
- b. Training of staff.
- c. Regular inspection and information process flow management
- d. Reporting and measurement of information management and processing.
- e. Regular training and re-training of staff.

### 4.2. Commitment to the Principles of POPIA

4.2.1. The Information Officer, any authorised operator and staff of the school is committed to the following principles:

- a. To be transparent with regards to the standard operating procedures governing the collection and processing of personal information.
- b. To comply with all applicable regulatory requirements regarding the collection and processing of personal information.
- c. To collect personal information only by lawful and fair means and to process personal information in a manner compatible with the purpose for which it was collected.
- d. Where required by regulatory provisions, to inform individuals when personal information is collected about them.
- e. To treat special personal information that is collected or processed with the highest of care as prescribed by regulation.
- f. Where required by regulatory provisions or guidelines, to obtain individuals' consent to process their personal information.
- g. To strive to keep personal information accurate, complete and up to date and reliable for their intended use.
- h. To develop reasonable security safeguards against risks such as loss, unauthorised access, destruction, use, amendment or disclosure of personal information.
- i. To provide data subjects with the opportunity to access the personal information relating to them and, where applicable, to comply with requests to correct, amend or delete personal information.
- j. To share personal information, such as permitting access, transmission or publication, with third parties only with a reasonable assurance that the recipient has suitable privacy and security protection controls in place regarding personal information and are allowed to such access.
- k. To comply with any restriction and/or requirement that applies to the transfer of personal information nationally and/or internationally.
- l. All new employees of the school will be made aware during induction, or through training programmes, of their responsibilities under the terms of this Policy and POPIA.



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## **4.3. The School is a Public Body**

- 4.3.1. As it can be viewed as a part of the State although it is a Public School with certain independent powers as assigned to the SGB and the School Principal and SMT.
- 4.3.2. An administrative part of the GDE.
- 4.3.3. Exercising a power or performing a duty in terms of the Constitution of South Africa and a provincial constitution.
- 4.3.4. Performing and exercising public power and performing a public function in terms of legislation.

## **4.4. The Principles of Compliance**

- 4.4.1. Obtain consent before collecting data (or processing, storing, or sharing it).
- 4.4.2. Be sure to only collect data needed for legitimate purposes.
- 4.4.3. To use the information in a way that matches the purpose of collection.
- 4.4.4. Take reasonable security steps to protect the integrity of the information.
- 4.4.5. Store the information only as long as required.
- 4.4.6. Uphold data subjects' rights by providing access and corrections to the information.

## **4.5. Privacy Policy and Privacy Notice**

- 4.5.1. A Privacy Policy prescribes and defines the handling practices and obligations that staff must abide by when processing personal information.
- 4.5.2. A Privacy Notice sets the tone and defines the School's data privacy mission statement for the School's external stakeholders and data subjects.

## **4.6. Specific Purpose Collection of Information**

- 4.6.1. Personal Information must be collected for a specific, explicitly defined, and lawful purpose by the School related to the function or activity of the responsible party. The data subject must be made aware of the purpose of the collection.

## **4.7. Rights of Data Subjects**

- 4.7.1. Where appropriate, the School will ensure that all data subjects are made aware of the rights conferred upon them in terms of section 5 of POPIA. When a minor turns 18, the rights belong directly to him or her, unless it is stipulated to the contrary in other legislation.
- 4.7.2. The rights are as follows:
  - a) to be notified that personal information about him, her or it is being collected as provided for in terms of section 18 of POPIA or his, her or its personal information has been accessed or acquired by an unauthorised person as provided for in terms of section 22 of POPIA;
  - b) to establish whether a responsible party holds personal information of that data subject and to request access to his, her or its personal information as provided for in terms of section 23 of POPIA;
  - c) to request, where necessary, the correction, destruction or deletion of his, her or its personal information as provided for in terms of section 24 of POPIA;
  - d) to object, on reasonable grounds relating to his, her or its particular situation to the processing of his, her or its personal information as provided for in terms of section 11(3)(a) of POPIA;



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- e) to object to the processing of his, her or its personal information at any time for purposes of direct marketing in terms of section 11(3)(b) of POPIA; or to object to the processing of his, her or its personal information at any time for purposes of direct marketing in terms of section 11(3)(b) of POPIA or in terms of section 69(3)(c) of POPIA;
- f) not to have his, her or its personal information processed for purposes of direct marketing by means of unsolicited electronic communications except as referred to in section 69(1) of POPIA;
- g) not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of his, her or its personal information intended to provide a profile of such person as provided for in terms of section 71 of POPIA;
- h) to submit a complaint to the Regulator regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as provided for in terms of section 74 of POPIA; and
- i) to institute civil proceedings regarding the alleged interference with the protection of his, her or its personal information as provided for in section 99 of POPIA.

#### **4.8. A Word of Caution to Parents/Guardians/Caregivers**

- 4.8.1. While laws apply to what the school and third parties can disclose about learners, they do not apply to what learners or their parents might disclose publicly, which means the parent and the child also have a responsibility to protect the child's privacy. What a parent and or his/her child posts on social media, for example, could be used by others, including private companies and law enforcement in some cases, and is not protected by POPIA.
- 4.8.2. Parents and learners must understand and use the privacy tools on any website or app that the School or they use for school or at home to limit who can view or access their information (that includes having strong, secure and unique passwords and be sure to never post anything online that they wouldn't want to be shared with others, including law enforcement, the school, tertiary institutions and current or future employers).

#### **4.9. Processing of Information by using Automated and Non-automated Means**

- 4.9.1. POPIA applies to the processing of any personal information by the School that has been entered into a record by or for the School as the responsible party by using automated and non-automated means.
- 4.9.2. This is subject to the proviso that when the recorded personal information is processed by any non-automated means, the record must form part of a filing system or is intended to form part of a filing system.

#### **4.10. General Description of Information Security Measures**

The School uses up to date technology/software to ensure the confidentiality, integrity and availability of the Personal Information under its care. Measures include:

- a. Firewalls.
- b. Virus protection software and update protocols.
- c. Logical and physical access control.
- d. Secure setup of hardware and software making up the IT infrastructure.



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e. Outsourced third party service providers are contracted to implement security controls on a regular basis.

#### 4.11. The POPIA Act's Eight Conditions for Lawful Processing of Information Adhered to by the School

4.11.1. POPIA issues its rules for using South African data in Chapter 3 of the Act. It refers to these rules as conditions, and they largely cover what data may be collected, what can be done with the data, and how to protect both the data and the data subject.

4.11.2. POPIA includes eight conditions for lawful processing including:

- a. Accountability.
- b. Processing limitation.
- c. Purpose specification.
- d. Further processing limitation.
- e. Information technology (quality).
- f. Openness.
- g. Security safeguards.
- h. Data subject participation.

4.11.3. A brief overview of each condition is as follows:

##### 4.11.3.1. Condition 1: Accountability

It stipulates that the responsible party has the responsibility of ensuring the rest of the conditions are in place before processing data. The responsible party must also **ensure compliance** both when deciding to process data and during the processing of the data.

##### 4.11.3.2. Condition 2: Processing Limitation

The Processing Limitation - places strict controls on what it means to lawfully process data. To meet the condition, data processors must:

- a. Process data in a way that **does not risk** the data subject's privacy.
- b. Process **only relevant data** with a given purpose.
- c. **Obtain the consent** from the data subject before processing (and keep proof of consent).
- d. Protect the **legitimate interest** of the data subject.
- e. Allow data subjects to **object to processing and/or withdraw consent** at any time
- f. Discontinue the processing of data after an objection or withdrawal of consent received for a data subject.
- g. Condition 2 also provides a **unique** stipulation: "Personal information must be collected directly from the data subject" except for in specific circumstances. The only time the School can collect data from a third-party source is if the data is a public record or is deliberately made public or if the School has the consent to do so or if doing so does not violate the legitimate interest of the data subject. There are no exceptions for those working in the School with the processing of data.

##### 4.11.3.3. Condition 3: Purpose Specification

Where Condition 2 limits the data the School can collect, Condition 3 the "Purpose Specification", details the reasons for collecting data.

- a. The idea that the School must collect information only for a "specific, explicitly defined and lawful purpose" related to one of the School's normal activities is at the heart of POPIA.



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- b. Moreover, the School must ensure that data subjects are aware of that purpose.
- c. The School may not retain records indefinitely. Once the School no longer needs a record for the processing purpose, it no longer has a right to keep the data unless required by law (civil, penal, contract, or other law).
- d. The School must destroy, delete or de-identify the record as soon as practical.
- e. The said process should render the data irretrievable.

#### 4.11.3.4. Condition 4: Further Processing Limitation

1. Conditions 2 and 3 are not the only processing limitations. Condition 4 the "Further Processing Limitation", continues to elaborate on how the School can and can't process data.
2. The main point to be noted is that the School must only process data in ways compatible with the purpose of the data it is needed for.
3. In the case of condition 4 POPIA requires the School to consider the relationship between further processing and the original purpose, the nature of the information, potential consequences of further processing, how the School collected the data, and any contractual rights.
4. The School can always further process data if:
  - a. The data subject consented.
  - b. The information came from the public record.
  - c. The law requires further processing.
  - d. The processing is related to national security.

#### 4.11.3.5. Condition 5: Information Technology or Quality

Condition 5 indicates that the School must take steps to ensure the data collected and subsequently processed is accurate and complete.

#### 4.11.3.6. Condition 6: Openness

1. Openness refers to the School's responsibility under the Promotion of Access to Information Act (PAIA). Essentially, the School must maintain strict documentation of all the processing activities it undertakes. Additionally, the School has to inform data subjects when it collects information.
2. Data subjects should be aware:
  - a. Under which circumstances, the School collects information.
  - b. When the School don't collect information.
  - c. The source of the School's information
  - d. The School's address and contact details.
  - e. Why the School collects the data (the School's purpose for collecting data).
  - f. Whether the collection of data by the school form a data subject is voluntary or mandatory.
  - g. What will happen if the data subjects don't provide their data to the School as requested.
  - h. The relevant legislation that allows for data collection from data subjects.
  - i. These must all be shared before the School collects information from the data subject.
  - j. Condition 6 also requires the School to have a Privacy Policy.



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## 4.11.3.7. Condition 7: Security Safeguards

1. Condition 7 details the security measures POPIA requires for personal information. In the Act, it is indicated that the School must employ "appropriate, reasonable, technical and organisational measures" designed to prevent both unlawful access and the loss or damage of the personal information. The School shall ensure the integrity and confidentiality of all Personal Information in its possession, by taking reasonable steps to:
  - a. Identify all reasonably foreseeable risks to information security; and
  - b. establish and maintain appropriate safeguards against such risks. To meet these obligations, the School must perform a risk assessment test, ensure the maintenance of safeguards, verify the effectiveness of the safeguards, and ensure new updates are provided to prevent new deficiencies or risks.
2. POPIA also indicates that anyone processing personal information must also only first gain the knowledge or authorisation of the School and consider the information to be confidential. Any other (third) parties who process the information on behalf of the School must sign a written contract and notify the School if there is a breach.
3. Condition 7 also provides a list of requirements if the School believes its security is compromised. First, the School must notify the Regulator and the data subject (when possible) and they must do so as soon as reasonably possible.
4. Data subjects must be notified in writing by email, letter, a news article, or by publishing an alert on a prominent part of the School's website. The Regulator may also direct the notification efforts as they see fit.
5. The notification must include enough information for the data subject so that they know what measures to take to protect themselves against further breaches.
6. Finally, the Regulator may require the School to publicise the breach if the Regulator believes doing so is reasonable.
7. Written records will be kept secure:
  - a. Personal Information records should be kept in locked cabinets, or safes.
  - b. When in use Personal Information records should not be left unattended in areas where non-staff members may access them.
  - c. The School shall implement and maintain a "Clean Desk Policy" where all educators and staff shall be required to clear their desks of all personal information any kind when leaving their desks for any length of time and at the end of the day.
  - d. Personal Information which is no longer required should be disposed of by shredding and a record kept (See Annexure for example of a log).
  - e. Any loss or theft of, or unauthorised access to, personal information must be immediately reported to the Information Officer or the Deputy Information Officers
8. Electronic records of any kind will be kept secure:
  - a. All electronically held Personal Information must be saved in a secure database.
  - b. As far as reasonably practicable, no Personal Information of data subjects of the School should be saved on individual computers, laptops or hand-held devices.
  - c. All computers, laptops and hand-held devices should be access protected with a password, fingerprint or with the password or screen finger scan being of reasonable complexity and changed frequently.



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- d. All staff of the School shall implement and maintain a "Clean Screen Policy" where all employees shall be required to lock their computers or laptops when leaving their desks for any length of time and to log off at the end of the day.
  - e. Electronic Personal Information which is no longer required must be deleted from the individual laptop, handheld device or computer and the relevant database. The employee must ensure that the information has been completely deleted and is not recoverable.
9. Any loss or theft of computers, laptops or other devices which may contain Personal Information must be immediately reported to the Information Officer, who shall notify the IT department, who shall take all necessary steps to remotely delete the information, if possible.
10. Passwords and Access: Users have a responsibility to safeguard any credentials granted to them by the School. In order to limit security risks, all Users must abide by the following:
- a. Attempts should not be made to by-pass or render ineffective security measures provided by the School.
  - b. Users may not:
    - i. Share user IDs or usernames.
    - ii. Divulge passwords to other users.
    - iii. Attempt to impersonate other users.
    - iv. Leave their computer unattended without logging out or locking
    - v. Share passwords between users, except where they are released as part of the approved procedure. An approved procedure exists for releasing passwords where accounts are required, and staff are unavailable.

#### **4.11.3.8. Condition 8: Data Subject Participation**

1. Condition 8 describes the rights of a data subject. In terms of POPIA, the data subjects have access to their personal information, including taking note of what information the School has and the option to ask for a description or record.
2. The data subject also has the right to request corrections to his/her record when the data is out of date, incomplete, inaccurate, excessive, or obtained unlawfully.
3. Upon receiving the request, the School must adhere to the request within a reasonable timeframe.
4. The School has the option to decline when it falls within its rights as stated in Chapter 4 of the law.
5. Condition 8 also has several parts. Part B refers to the prohibition of processing of special personal information (including religious beliefs, health information, biometric information, etc.) or criminal behaviour.
6. The only exceptions that apply include:
  - a. If the data subject provided consent.
  - b. If processing is necessary for establishing a defence of a right.
  - c. If processing is required for fulfilling obligations under international public law.
  - d. If processing is in the public interest.
  - e. If the data is already in the public domain.
  - f. If processing involves historical research, or statistical purposes (within the public interest or if asking consent is impossible or close to impossible).



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7. POPIA puts significant emphasis on these special categories of information and each type of data has a list of exemptions. If the School has to process a protected type of data, it should rather refer directly to the law and/or seek legal advice.

#### **4.12. Data of Children**

- 4.12.1. The School may not process children's personal information unless:
- a. The School have the consent of a "competent person" (parent/guardian/caregiver/legal entity/authority).
  - b. It is necessary for obligations under POPIA and other legislation.
  - c. It is required for upholding international public law.
  - d. It is necessary for research purposes.
- 4.12.2. The Regulator may also grant permission if it is in the public interest and the School agrees to use the appropriate safeguards. In addition, the Regulator may also impose further conditions related to the nature of the data, the amount of information, and the method of processing.

#### **4.13. Access and Security to Information/Records**

- 4.13.1. Records in all formats, shall at all times be protected against unauthorised access and tampering to protect their authenticity and reliability as evidence of the business of the School.
- 4.13.2. Security classified records shall be managed only by authorised persons.
- 4.13.3. No staff member shall remove records in any format that are not available in the public domain from the premises of the School without the explicit permission of the Information Officer in consultation with the Chairperson of the SGB.
- 4.13.4. No staff member shall provide information and records that are not in the public domain to the public without consulting the Information Officer. Specific guidelines regarding requests for information are contained in the Promotion of Access to Information Policy which is maintained by the Information Officer.
- 4.13.5. Personal information shall be managed in terms of the policy and POPIA.
- 4.13.6. No staff member shall disclose personal information of any member of staff or any other data subject to any member of the public without consulting the Information Officer first.
- 4.13.7. An audit trail shall be logged of all attempts to alter/edit electronic records and their metadata.
- 4.13.8. Records storage areas shall at all times be protected against unauthorised access. The following shall apply:



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- 4.13.9. Registry and other records storage areas shall be locked when not in use.
- 4.13.10. Access to server rooms and storage areas for electronic records media and CCTV shall be managed with key card access or strict key control.
- 4.13.11. The School's Access to the safes and the walk-in safe and key controls policy will be adhered to.
- 4.13.12. **Paper-based records**
- a. No records shall be removed from paper-based files without the explicit permission of the records manager.
  - b. Records that were placed on files shall not be altered in any way.
  - c. No alterations of any kind shall be made to records other than correspondence files without the explicit permission of the records manager.
  - d. Should evidence be obtained of tampering with records, the staff member involved shall be subject to disciplinary action.
- 4.13.13. **Electronic records**
- a. The School shall use systems which ensure that its electronic records are:
    - i. authentic;
    - ii. not altered or tampered with;
    - iii. legible;
    - iv. auditable; and
    - v. produced/processed in systems which utilise security measures to ensure their integrity.
- 4.14. The School's Compliance Management System**
- 4.14.1. Compliance is not a "one-and-done event". It is an ongoing and active process that requires Management. The School should have an active compliance plan in place that provides for a systematic way to review and update the School's processing standards on a regular basis.
- 4.15. Consent to Process Personal Information**
- 4.15.1. In terms of POPIA, a "Responsible Party" (in this case the school) has a legal duty to process a "Data Subject's" personal information (in this case the personal information and related details of a parent/legal/guardian/caregiver and/or any enrolled learner and/or any employee of the school and the GDE and/or any other person) in a lawful, legitimate and responsible manner.
- 4.15.2. In order to discharge this duty, the School requires the express and informed permission to process the Personal Information of a data subject or any other third party.



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- 4.15.3. In the event of any data subject or third party or any other person, refusing to give the required consent, the School will still have the right, in terms of POPIA, to process such information without the mentioned consent under any of the following circumstances:
- a. where such processing and use of personal information is necessary in order to give effect to a contractual relationship as between the person and the school.
  - b. where such processing is required in terms of a law, such as without limiting the generality thereof:
    - i. the Basic Conditions of Employment Act 75 of 1997(BCEA),
    - ii. the Labour Relations Act
    - iii. the Skills Development Act, 97 of 1998(SDA),
    - iv. Skills Development Levies Act, 9 of 1999 (SDLA)
    - v. the Employment Equity Act, 55 of 1998
    - vi. The Employment of Educators Act
    - vii. The Unemployment Insurance Contributions Act, 4 of 2002 (UICA) Unemployment Insurance Act, 6 of 2001 (UIF),
    - viii. Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS), the Financial Intelligence Centre Act 38 of 2001 (FICA),
    - ix. the National Credit Act, 34 of 2005 (NCA)
    - x. the Compensation for Occupational Injuries and Diseases Act, 130 of 1993,
    - xi. Children's Act
    - xii. The Disaster Management Act and all related regulations with regard to COVID-19;
    - xiii. The Occupational Health and Safety Act
    - xiv. National Education Policy Act, 1996 (Act No. 27 of 1996), as amended
    - xv. Criminal Law (Sexual Offences and Related Matters) Amendment Act (Act no 32 of 2007)
    - xvi. The Control of Access to Public Premises and Vehicles Act 1985 (Act No. 53 of 1985), including regulations made under it ("the Public Premises Act")
    - xvii. Regulations for Misconduct of Learners at Public Schools and Disciplinary Proceedings, 2001 (General Notice 2591 of 2001).
    - xviii. Drugs and Drugs Trafficking Act (Act 140 of 1992)
    - xix. Child Justice Act 75 of 2008.
    - xx. Medicines and Related Substances Act No 101 of 1965, As Amended.
    - xxi. Regulations for Safety Measures at Public Schools Government Notice No. 1040, October 2001, as amended.
    - xxii. Guidelines for the Consideration of Governing Bodies in Adopting a Code of Conduct for Learners, General Notice 776 of 1998.
    - xxiii. Regulations to Prohibit Initiation Practices in Schools, GN No. 1589, 13 December 2002
    - xxiv. the Schools Act, Act 84 of 1996, as amended and any related regulations and/or provincial legislation and/or related regulations and/or policies and policies of the school.



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- c. Where such processing is necessary to protect the legitimate interests of the School or a third party.

## **4.16. Signature of any document and the Purpose of a Signature on a document**

- 4.16.1. When a data subject who is entitled to do so signs a document the School assumes the following:
  - a. That the data subject has read the document in order to fully understand what he/she is signing and agreeing to.
  - b. That if anything is unclear, he/she has the right to ask for clarification and/or may obtain legal advice before signing.
  - c. Ensure that all blank spaces in the document are completed or scratched out and signed next to it.
  - d. If there is anything that has to be changed in the document, to make sure that the changes are made before signing the document.
  - e. Once the data subject has signed a document he/she is legally bound by its contents.
  - f. For certain documents, an electronic signature will not be considered as a valid signature where it must still be in a physical form and signed by hand.
  - g. If a person cannot sign a document himself/herself (either owing to being illiterate or owing to a physical condition that prevents him/her from writing) he/she may sign the document with a mark (such as an 'X') or using a thumbprint. It might be necessary to make the mark or thumbprint in the presence of a commissioner of oaths or a notary.
  - h. It is also possible for a representative to sign a document on behalf of someone else or an entity such as the SGB or a company, however, the representative must be authorised in writing or by a resolution or a power of attorney to do so.

## **4.17. Witnessing documents**

- 4.17.1. The purpose of a witness is to verify the signature of a person who is a party to a contract or other document.
- 4.17.2. The witness is needed to confirm that the correct party has signed the document and no fraud has occurred, such as someone signing the document on another person's behalf.
- 4.17.3. In certain other matters, it is legally required to witness certain documents, like statutory declarations or affidavits in legal proceedings, to have the signature witnessed by a person with specific qualifications (an authorised witness).
- 4.17.4. There are also specific requirements for witnessing signatures on will documents such as powers of attorney.



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- 4.17.5. A witness's signature can be useful for evidentiary purposes. If a party to the agreement later alleges he/she did not sign, the person who witnessed the party signing can be called to confirm it.

## 4.18. Steps to Correctly Witness a Signature

- 4.18.1. When witnessing a signature, the witness must:
- ensure that the person signs the document in front of the witness. It is not acceptable for him/her to provide the witness with a document that someone else has already signed and to request the witness, to witness it;
  - use black ink, as this will scan more clearly on electronic versions of the document;
  - check the person has signed where required on all pages of the document;
  - initial any changes** that the person makes after signing the document;
  - check what additional details are needed to provide when witnessing, as set out on the document and provide them correctly. This may include the date, occupation and address of the witness; and
  - it must be possible for the witness to be traced at a later stage.

## 4.19. POPIA and E-mail Usage

- 4.19.1. If it is needed, each Staff member within the School is provided with a school email account to assist with their work for the School. This account is the primary way that staff members will communicate with parents and other colleagues and other agencies and entities.
- 4.19.2. Email account holders must comply at all times with this Policy.
- 4.19.3. The email account of a staff member, and any information contained in it including content, headers, directories and email system logs, remains the property of the School.
- 4.19.4. Usage of the school email system is mainly for school, academic and professional purposes.
- 4.19.5. Incidental use of an e-mail account for personal purposes is allowed and is subject to the same policies and regulations as official use. However, systematic use on behalf of individuals or organisations that are not associated with the School or its business is not allowed.
- 4.19.6. Users are responsible for the integrity of their mailbox. IT Services cannot restore any emails deleted accidentally or otherwise. All email messages may be subject POPIA and other legislation and laws of South Africa and any employment prescripts as amended, updated or replaced from time to time.



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- 4.19.7. Although the school has systems in place to protect the integrity and safety of the School's electronic network, it must be noted that the School cannot guarantee the confidentiality of the information stored on any network device belonging to the School.
- 4.19.8. Great care should be taken when attaching documents to ensure the correct information is being released.
- 4.19.9. Any email should be regarded as a written formal letter and data.
- 4.19.10. Any defamatory or careless remarks can have very serious consequences. The use of indecent, obscene, sexist, racist or other inappropriate remarks whether in written form, in cartoon form or otherwise, is strictly prohibited.
- 4.19.11. To prevent computer viruses being transmitted through the network, care must be taken when dealing with suspect e-mails and attachments of unknown origin are received. Suspect e-mails should be deleted immediately and never forwarded to other Users.
- 4.19.12. E-mail users must be aware of the use of dangerous code by hackers and other outside parties which refers to any computer programme that causes destruction or harm and has been programmed in such a way with the malicious intent of the content of a computer or other electronic communication device. Dangerous Code is classified as file infector viruses, system or boot record viruses and macro viruses. It must be noted that viruses can either be decimated or "contracted" by the exchange of various media or by the receipt in an e-mail from a source that is unknown or spam. Effective anti-virus software will normally indicate such e-mails.
- 4.19.13. Staff and learners are not authorised to retrieve or read any e-mail messages that are not sent to them or not for their attention, except when authorised under the approved procedure.
- 4.19.14. Email messages must not be automatically forwarded (redirected) to external non-school accounts such as a staff member's own personal e-mail account. Should a staff member or learner receive any offensive, unpleasant, harassing or intimidating messages via e-mail, he/she are requested to inform the Deputy Principal or Grade Head immediately.

## **4.20. POPIA and Bulk E-mail**

- 4.20.1. From time to time the School authorities may wish to communicate with parents via bulk email.
- 4.20.2. Such bulk e-mail lists must comply with the following:
  - a. Staff and members of the SGB may not send emails to the list which are obscene, abusive or threatening.
  - b. The contents of emails must be courteous and show tolerance towards other users of the list.



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- c. Senders must be mindful of the fact that any messages will be widely published.
- 4.20.3. Therefore, users are expected to exercise restraint when voicing controversial opinions. In particular, they must:
- a. Respect the variety of cultures and beliefs that are likely to be represented across such a large audience.
  - b. Ensure that any messages they send cannot be construed as being in any way defamatory.
  - c. Ensure that they do not damage the reputation of the School or any of its staff members/parents/learners/agents/contractors or undermine its overall mission.
  - d. Take care not to forward emails that were intended only to the sender's address, to the bulk distribution list.
  - e. Chain letters/e-mails of any sort should not be sent.
  - f. There must be no third-party commercial advertising using the school bulk email lists unless authorised in advance by the principal.
  - g. E-mail messages originating elsewhere in a private capacity must not be forwarded to the lists without the permission of the original sender.
  - h. Only material in keeping with the purpose of the lists should be sent and, in particular, should not include messages for which other dedicated services are provided.
  - i. Some lists are for official staff announcements only. These lists will be used for formal communication from designated school members of the SMT. Permission to send to these lists will be restricted and authorisation will be granted by the principal/deputy principal. Replies to this type of message must not be sent to the whole list.
- 4.20.4. E-mail messages must be kept as short as possible and must contain only text:
- a. Images, logos, 'watermark' backgrounds, etc. are not permitted since they greatly increase the size of a message.
  - b. Emails to the list must as far as possible not include any attachments. Where there is a need to provide staff with copies of reports, forms etc., these should be made available on the school web to which only staff members may have access and a link to the document included in the message.
  - c. In general, messages should be sent only once. Exceptionally, official reminders and security/safety-related messages may be repeated.
- 4.20.5. In the event of an IT Security issue, the School reserves the right to stop bulk email lists until the threat has been mitigated.

## 4.21. POPIA and Internet Usage and Connections

- 4.21.1. The School's Internet connections are intended for activities associated with:
- a. The work and information of the School.
  - b. The exercise by users of their responsibilities and duties.
  - c. The professional/academic development of Staff and Learners.



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- 4.21.2. Internet access and e-mail shall not, for example, be used for the following:
- Personal gain or profit.
  - For anyone to represent him-herself as somebody else
  - To advertise or otherwise support or engage in illegal activities.
  - To endorse any product or sponsor except if approved by the SGB.
  - To provide lists or information about the School or the School's staff, parents/guardians/caregivers/agents/contractors, SGB members or learners to others and/or to send other confidential information without approval.

## 4.22. POPIA and Personal Websites

- 4.22.1. The School recognises that from time to time staff will set up websites, blogs or wikis that, while related to their academic or professional disciplines, are personal sites and not formal School Sites.
- 4.22.2. In this regard, the purpose of the POPIA policy is to strike the appropriate balance of providing staff with the academic freedom to engage in open discourse, while also protecting the reputation of the School and that of its staff and other members of the school community. In addition, these POPIA policy rules ensure that the individual views and opinions discussed openly on such sites are not portrayed as the formal position of the School at any time or under any circumstances.
- 4.22.3. Personal websites should not display the School crest, regalia, logo or other School trademarked/copyrighted materials, including the School designs, or otherwise appear to be an "official" School web page, unless with the permission of the Principal and the SGB.
- 4.22.4. The use of personal websites for the following purposes is strictly prohibited:
- Any use which may have the effect of violating any laws (or exposing the School to unacceptable legal risk).
  - Any use which may adversely impact on School computing or on network resources.
  - Any use which the School considers may be defamatory or libellous.\
  - Any use which may infringe the rights of any third party in respect of personal data, intellectual property or other confidential or proprietary information.
  - Making accessible materials which could have the effect of damaging the reputation and goodwill of the School.
  - Are otherwise in breach of this Policy.
- 4.22.5. On personal websites, staff members are required to identify views expressed as their own and that the staff member does not hold him-/herself out as representing the School. If an employee of the school identifies him-/herself as being a member of Staff of the School, he/she must state clearly that any views expressed are not necessarily those of the School.



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## **4.23. Retention of Personal Information Records**

- 4.23.1. The School may retain Personal Information records as required by the Archives Act, POPIA, other acts and legislation unless a data subject objects thereto. If the data subject objects to the period of retention of his PII the school shall retain the records to the extent that it is needed or required by law for a shorter period.

## **4.24. Records that cannot be found or do not exist or believed not to exist**

- 4.24.1. When the School has searched for a record and it is believed that the record does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

## **4.25. Scanned documents**

- 4.25.1. If documents are scanned, the hard copy must be retained for as long as the information is used or for 1 year after the date of scanning, with the exception of documents pertaining to any staff of the school.
- 4.25.2. Any document containing information of the written particulars of an employee, including the employee's name and occupation, time worked by each employee, remuneration and the date of birth of an employee under the age of 18 years the information must be retained for a period of 3 years after termination of employment.

## **4.26. Monitoring and Implementation of the Policy**

- 4.26.1. The SGB, the SMT, the Principal, if not the Information Officer and all operators, as defined by POPIA, are responsible for administering and overseeing the implementation of this policy manual and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes.
- 4.26.2. Periodic reviews and audits will be conducted by the Information Officer/Deputy Information Officer where appropriate, to demonstrate compliance with POPIA, any policies and guidelines.

## **4.27. Operating Controls**

- 4.27.1. The SGB, the Principal, and SMT of the School shall establish appropriate privacy standard operating controls that are consistent with this policy and regulatory requirements. This will include:
- Allocation of information security responsibilities.
  - Incident reporting and management.
  - User ID addition or removal.
  - Information security training and education.
  - Data backup and retention of records.



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## **4.28. Duty to Report a Vulnerable Child in Need of Protection**

- 4.28.1. In terms of the Children's Act, any person, including professionals who work with children, must immediately report to the principal, the CPU of SAPS and/or Social Services any concerns regarding any child that might be at risk if they have reasonable grounds to suspect that a child is in need of protection and complete a Form 22.

## **4.29. Notifying Parents of Harm to Learners**

- 4.29.1. The GDE requires school employees to report to the principal if they become aware that a learner may have engaged in an activity that could result in their suspension or expulsion. If the principal believes that a learner has been harmed as a result of this activity, he/she has a duty to notify the District Director/Circuit Manager, the SGB and that learner's parent or guardian, and the parent or guardian of any other learner who engaged in the activity. However, there are limits on the nature and extent of personal information that can be shared.

## **4.30. Occupational Health and Safety**

- 4.30.1. In terms of the Occupational Health and Safety Act, the SGB and /or the Principal or his/her delegate and other employers must advise an employee of any danger to their health or safety that they are aware of.

## **4.31. Certified Copies**

- 4.31.1. Certified copies to a copy of a document that has been stamped by a Notary/Commissioner of Oaths to certify that the copy is a true copy of the original. And that's all it means. A certified copy does not verify the authenticity of the original document, only that the copy is a true copy of what appears to be an original document to the person certifying the copy.
- 4.31.2. Certified Copies can only be made of documents that are original. What makes something an original document is whether it has some sort of seal, stamp, or signature. Some types of documents that are very common to certify as true copies include such things as Identification documents (e.g. Passport, Driver's License, Birth Certificate), Diplomas, Report Cards, etc.
- 4.31.3. The reason the school requires certified copies is to ensure that the original documents or ID books/cards and other forms of identification and FICA documents are genuine. This is to avoid fraud, where any person can make up certificates and documents on a computer that looks real. A certified copy also avoids the owner of important documents (especially identity documents) giving up possession of those documents which might mean a risk of their loss or damage.



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- 4.31.4. To request certification of a copy of a document the data subject has to take both the original document and the copy to an authorised official which includes an official of SAPS, attorneys, some ministers of religion and/or the principal of the school.
- 4.31.5. The following must be complied with when submitting certified copies as a copy of a true original document to the school:
- Each document copy must be certified separately.
  - The certification date stamp must not be older than 3 months.
  - The full names and surnames, date, designation and signature of the Commissioner of Oaths who certify the documents.
  - The Commissioner of Oaths must write down or stamp that he/she certifies that the document is a true copy of the original document and that there is no indication that the original document has been altered in any way by an unauthorised person or persons.
  - The Commissioner of Oaths must append a signature and also print out his/her name, designation, contact particulars and date.
- 4.31.6. The person certifying a document should not be related to the person submitting the document, living at the same address as the person submitting the document or be in a relationship with the person submitting the document.
- 4.31.7. Failure to comply with the above with regard to certified copies will result in a document being rejected.

## **4.32. School Photographs/Images/Videos of Learners**

- 4.32.1. Photographs, other images and sound recordings are often taken of learners, in many cases by professional photographers and at the school's request. Any photograph of one or more identifiable individual(s) is considered to be personal information.
- 4.32.2. The School is permitted to collect personal information, including photographs, where it is necessary to the proper administration of a lawfully authorised activity, but the photographs/ images may not be released to a third party unless a parent's consent was obtained. The collection of learner photographs is considered necessary to the operation of the school (a lawfully authorised activity because, for example, photographs are used for ID cards, access cards and/or to enable staff to identify learners, provided the records are kept confidential).
- 4.32.3. If the school uses a professional photographer, the SGB/principal/Information officer is still ultimately responsible for the security and confidentiality of the learners' personal information/image.
- 4.32.4. Any service agreements with third-party vendors must align with the provisions of POPIA.



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- 4.32.5. Their contracts should clearly describe the administrative, physical and technical safeguards to protect personal information and the obligation to destroy any images if not handed over to the school for safekeeping.
- 4.32.6. The permission of parents may be obtained for the use of photographs for other purposes such as annual photo's for parents or the website, the media or promotional purposes, provided that children at risk are not shown or their images pixelated.
- 4.32.7. Images and any other videos of learners on the school's website must be disabled so that it cannot be copied or downloadable

## **4.33. SGB Employees' Information**

- 4.33.1. Each appointed employee of the SGB will sign an Employment Contract containing the relevant consent clauses for the use and storage of employee information, and a confidentiality undertaking as part of the contract and will be personally responsible for ensuring there are no breaches of confidentiality in relation to any Personal Information, however, it is stored. Failure to comply will result in the instigation of a disciplinary procedure.
- 4.33.2. Each SGB employee currently employed within the school will sign an addendum to their Employment Contract or an undertaking containing the relevant consent clauses for the use and storage of employee information, and a confidentiality undertaking as part and will be personally responsible for ensuring there are no breaches of confidentiality in relation to any Personal Information, however, it is stored if not included. Failure to comply will result in the instigation of a disciplinary procedure.
- 4.33.3. Staff will sign relevant consent and confidentiality agreements/undertakings for purposes of processing their information in terms of POPIA processing.

## **4.34. CCTV**

- 4.34.1. The School will post notices at every entrance gate and the entrance to the administration office informing persons on the school property that the School uses CCTV to monitor the school grounds. In order to:
  - a. protect and ensure the personal safety of data subjects when on the school premises; and
  - b. to investigate, detect or prevent crime and to apprehend or prosecute offenders.
  - c. to monitor and record activities that are in plain view on the school's premises.
- 4.34.2. Data subjects must note that all audio or visual recordings that the School record/produce using CCTV cameras are records of the school.
- 4.34.3. The School must retain these records in accordance with the School's record retention schedules and policies.



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## 4.35. Entry to the School Grounds by Parents and Visitors

- 4.35.1. The School and SGB reserve the right to:
- Inspect any person and/or his/her property when entering the School premises.
  - Require each person to enter their details into a register and their ID may be checked to verify it is the person entering the premises.
  - The School may also record any details of a vehicle entering the premises.
  - The School may refuse any person entry to the school's premise in the principal's discretion.

## 4.36. Bots

- 4.36.1. Bots are automated programmes that run over the Internet. Bots may be used responsibly by the school to facilitate the receipt of e-mails and other messages on social media platforms to acknowledge receipt of e-mails and other electronic information received or to facilitate answering FAQs about the school on its website and other social media platforms.

## 4.37. Direct Marketing by Means of Unsolicited Electronic Communications

- 4.37.1. In terms of this Manual/Policy, direct marketing is the use of personal information for the purposes of direct marketing by means of any form of electronic communication or other forms of communication.
- 4.37.2. Direct marketing is PROHIBITED unless the school has obtained consent, or the data subject is already a parent of the school who has provided consent or a prospective parent who wants to enrol his/her child as a learner of the school, or a person who requests information with regard to the school that does not include any information of another person or data subject.
- 4.37.3. The school may only approach a person/data subject for consent, ONCE, and if they have not previously withheld such consent. The School may only USE the information for the purpose it was obtained.
- 4.37.4. Any communication for the purpose of direct marketing from the School must contain:
- 4.37.4.1. Details of the identity of the sender of the school, or on behalf of the school clearly stated with the contact details of the person of the school who the receiver can make contact if they do not wish to deal with the sender; and
  - 4.37.4.2. The address or other contact details to which the recipient may send a request to opt-out.
- 4.37.5. Obviously, it is not possible to fit all information on some forms of communication (like an SMS/WhatsApp). In that case, the school can provide a link (in the form of a tiny URL like "T's and Cs") to a webpage that sets out the information.



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## **4.38. POPIA Complaints Procedure**

- 4.38.1. Complaints may be filled via email to the School at email: ###.

## **4.39. Destruction of Documents**

- 4.39.1. Documents may be destroyed by shredding it after the termination of the retention period specified herein, or as determined by the School from time to time.
- 4.39.2. Each department is responsible for attending to the destruction of its documents and electronic records, which must be done on a regular basis. Files must be checked in order to make sure that they may be destroyed and also to ascertain if there are important original documents in the file. Original documents must be returned to the holder thereof, failing which, they should be retained by the school for a further one year and if not requested destroyed.
- 4.39.3. The documents may be made available for collection by an approved document disposal company or destroyed by the school. All documents destroyed must be logged in the register.
- 4.39.4. Deletion of any electronic records must be done in consultation with the IT Department, to ensure that deleted information is incapable of being reconstructed and/or recovered and logged in the register.

## **4.40. Disciplinary Action**

- 4.40.1. Where a POPIA complaint or a POPIA infringement investigation has been finalised, the School may recommend any appropriate administrative, legal and/or disciplinary action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity outlined within this policy.
- 4.40.2. In the case of ignorance or minor negligence, the School will undertake to provide further awareness training to the employee.
- 4.40.3. Any gross negligence or the wilful mismanagement of personal information will be considered a serious form of misconduct for which the School may summarily dismiss the employee.
- 4.40.4. Disciplinary procedures will commence where there is sufficient evidence to support an employee's gross negligence.

## **4.41. Personal Information No Longer Personal Information**

- 4.41.1. De-identified personal information is not personal information. Personal information of a deceased person is not personal information, as it does not relate to a living natural person.



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## 4.42. Encryption of Personal Information

4.42.1. Encryption is a key technical measure for securing school data and the first line of defence, and all electronic information must have encryption and passwords to access personal information. Encryption is very important and is a key aspect of complying with POPIA.

## 4.43. Information held in "THE CLOUD" to comply with POPIA

4.43.1. Should many copies of personal information exist in many different places it is exposed to a greater number of risks and breach. If the school can consolidate personal information into one encrypted safe central location in the cloud and then control the security and access to the data subjects' personal information, the school will be protecting personal information.

## 4.44. Data Portability

4.44.1. It is about moving or copying personal data from one place to another, whether it be from one data controller to another or one IT system to another.

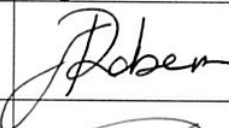
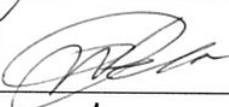

4.44.2. Section 20 of POPIA sets out the right that the data subject has to data portability. This means that the information that the data subject has provided to the data controller of the school must be able to be moved in a structured and commonly used format and to achieve this action the personal data must be portable.

## 5. SHORT TITLE

This Policy will be known as the POPIA Policy of the School.

## 6. AMENDMENTS

Modifications and updates to this policy manual and other information-sharing policies, legislation, or guidelines will be brought to the attention of all staff.

Designation	Signature	Date
Principal		11. 7. 24
SGB Chairperson		11/07/24
Circuit Manager		11/07/2024