



DWA Educational Trust: Pinocchio Creche
50 Main Road, Green Point, Cape Town, 8005

PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

Dear Parent/ Legal Guardian/ Carer/ Customer,

This letter serves to obtain permission from you, the Data Subject and/or Competent Person in terms of the collection of information on yourself and your child in terms of:

- **The Protection of Personal Information,**
- **The General Data Protection Regulations, and**
- **The Promotion of Access to Information Act.**

The reasons for collecting the information, when enrolling your child/ren, are:

1. For consumers of our services, i.e. parents and legal 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 DWA Educational Trust: Pinocchio Creche.
- 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. Comply with our statutory, regulatory, legal and other obligations under various Acts.
- h. Perform any reasonably required purpose for other administrative and operational functions.
- i. To understand each child's family dynamic in order to support them their parents in times of need.

2. For potential consumers:

- a. Verify information.
- b. Check credit rating.
- c. Direct marketing.
- d. Any other reasonable purpose as reasonably required by DWA Educational Trust and Pinocchio Creche core business.

3. For children:

- a. To make, or assist in making, decisions about their care and education.
- b. To form a view of each child as an individual and to identify and/or improve the service that is provided.
- 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.

Collection of Personal Information (PI)

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

INITIALS: _____

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.

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"> • Credit score and references • ID number • Medical aid number and main member details • Occupation and place of employment • Passport number if no SA ID • Payment arrangements • Race or ethnic origin • Permission to take footage & photographs |

| 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 • Cultural/Nick name/S • 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 |

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.

Security of Personal Information (Data Protection)

DWA Educational Trust: Pinocchio Creche 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 locked boxes in a lockable secured cupboard, in a secured area.
3. Use of PI has been document in this policy and implemented in the ECD center. It effectively monitors access and usage of the information.

INITIALS:



4. Access to PI has been documented in this policy and implemented in the ECD center.
5. Our computers and networks are securely protected through BitLOCKER software, 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
 - b. Barbed wire
 - c. Armed Response Security
 - d. Alarm System
 - e. CCTV Security Cameras
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 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. Reports and Assessments and Correspondence will be sent with Children traveling with transport services or caregiver or domestic workers or authorized persons to collect the children.
 - c. 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 center.
13. To perform our contractual obligations entered into between DWA Educational Trust: Pinocchio Creche 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.



INITIALS: _____

Please initial each page, sign and return this letter to the Information Officer at DWA Educational Trust: Pinocchio Creche.

Signed at on this day in the month of, 20.....

Child/rens Name/s

Father/Guardian Name

Signature

Date

Mother/Guardian Name

Signature

Date

Please don't hesitate to contact me if you have any queries.

Kind regards,



Helen Phillips
INFORMATION OFFICER
TEL: 021 439 8124

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