**Recommended POPI Act Policy Framework**

The POPI Act (POPIA) (section 109(3)(g) expects that organisations will demonstrate ***good policies, procedures and practices to protect personal information***. Failure to do so is likely to result in increased monetary penalties and potentially lead to reputation loss.

To address this requirement we recommend:

1. A policy framework be established, with a formal structure and supporting documentation
   1. Our toolkit supplies a policy framework guideline document
   2. Our toolkit supplies a policy development guideline document
2. An inventory of existing policies be completed
   1. Our toolkit supplies a policy inventory tool which supports the development of a complete picture of existing policies and the evaluation of those policies for use in relation to POPI Act compliance
   2. This inventory takes place across all areas of the business as compliance with the POPI Act has wide ranging implications, including but not limited to Governance, Risk, Compliance, Human Resources, Information & Communication Technology, Finance, Marketing
3. An evaluation be conducted as to policy gaps and how to fill those gaps
   1. Our toolkit offers a policy usage tool which supports decision making in terms of additions to existing policies, replacement policies, updating and merging of policies, creation of new policies
4. Policy templates are deployed where possible, with appropriate tailoring to meet the unique needs of each organisation to offer a high quality, low cost solution to a POPI Act-compliant policy framework.
5. Our toolkit recommends the use of an umbrella POPIA policy template, with reuse of existing policies updated for POPI Act compliance where possible and appropriate. Existing, updated, replaced or new policies are then referenced in the POPIA umbrella policy.
6. A number of activity logs also need to be created and these are included in the list of templates Our toolkit can supply
7. Our toolkit policy templates include
   1. PAIA Manual Template \*
   2. POPIA “Opt-in and Opt-out” considerations \*
   3. POPIA Acceptable Use Policy \*
   4. POPIA Act Policy Template \*
   5. POPIA Act Statement on compliance \*
   6. POPIA and BYOD recommendations
   7. POPIA and Cloud recommendations
   8. POPIA and Smart Devices recommendations
   9. POPIA and Social Media recommendations
   10. POPIA Audit Report log \*
   11. POPIA CCTV Policy \*
   12. POPIA Clean Desk Policy \*
   13. POPIA Data Loss Prevention Measures Tool \*
   14. POPIA Data subjects access request log \*
   15. POPIA Destruction log \*
   16. POPIA Direct Marketing Policy template \*
   17. POPIA Disposal log \*
   18. POPIA Electronic Direct Marketing Consent log \*
   19. POPIA Electronic Direct Marketing Denial log \*
   20. POPIA Employee compliance commitment \*
   21. POPIA Guidelines when amending documents \*
   22. POPIA Information Security Policy \*
   23. POPIA Information Technology Equipment Disposal Policy \*
   24. POPIA Ongoing POPIAA compliance awareness plan \*
   25. POPIA Personal Information Backup Policy \*
   26. POPIA Personal Information Sharing log \*
   27. POPIA PI Owner Responsibility Undertaking \*
   28. POPIA Policy development framework \*
   29. POPIA Privacy Impact Assessment Key Questions \*
   30. POPIA Quality PI guide \*
   31. POPIA Records Management Policy Template \*
   32. POPIA Regulator Report log \*
   33. POPIA Sample employee privacy policy \*
   34. POPIA Security Compromise log \*
   35. POPIA Security Compromise Management Guidelines \*
   36. POPIA Self-assessment of POPIA Ongoing Compliance Monitoring checklist \*
   37. POPIA Staff Consent Form template \*
   38. POPIA Strategy template \*
   39. POPIA Strong Password Guidelines \*
   40. \*All items are copyrighted to the developers.
8. That operating procedures and practices due to their unique nature per organisation are developed or revised once the policy framework has been implemented.

The policy framework and supporting documents form roughly 40% of the contents of the broader POPIA Compliance Toolkit which is available, which covers other POPIA compliance areas such as project management tools, assessment tools and risk evaluation and reporting tools.