Detailed POPIA Compliance Checklist

Step 2 - Appoint an Information Officer

*(Legal requirement – Default is highest ranking officer)*

|  | **Procedure** | **Yes** | **No** | **N/A** | **Done by** | **Date** | **Comments** |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | Did you ensure alignment between your Promotion of Access to Information Act (PAIA) and POPIA Information Officer (IO)? |  |  |  |  |  |  |
|  | * *When drawing up the Job description or KPI’s for the Information Officer ensure that you include all the duties / responsibilities stipulated in both ACTs.*
 |  |  |  |  |  |  |
|  | Did you decide whether the CEO can fulfil the IO function or needs a Deputy/Deputies (DIO)? |  |  |  |  |  |  |
|  | * *After listing the responsibilities as stipulated by the 2 ACTs, it will be clear how much will be required of the Information Officer e.g. taking calls for complaints / having to keep regular updates from the Regulator – Should this be too much for the CEO, a formal delegation, signed by both parties should be drawn.*
* *Deputy should be senior enough to represent the organization should they need to be in court and should be aware of the penalties associated with the role.*
* *Information Officer may be outsourced to an expert service provider.*
 |  |  |  |  |  |  |
|  | Did you agree IO/DIO roles and responsibilities? |  |  |  |  |  |  |
|  | * *All parties are required to sign a written document of the delegation which includes responsibilities and penalties for non-compliance as well as how the role will be performance managed.*
 |  |  |  |  |  |  |
|  | Did you Complete the formal appointment process? |  |  |  |  |  |  |
|  | * *Appointment process must include training of appointee & should be included in performance management process should it not be the CEO who is appointed as Information officer.*
 |  |  |  |  |  |  |

Information Officer: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

***Important Note:*** *Remember to attach proof of the above steps to this checklist, where appropriate.*