



# BARNOWL

## BarnOwl Compliance Module Overview

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## 1. Introduction

This document provides a high level overview of the BarnOwl Compliance module:

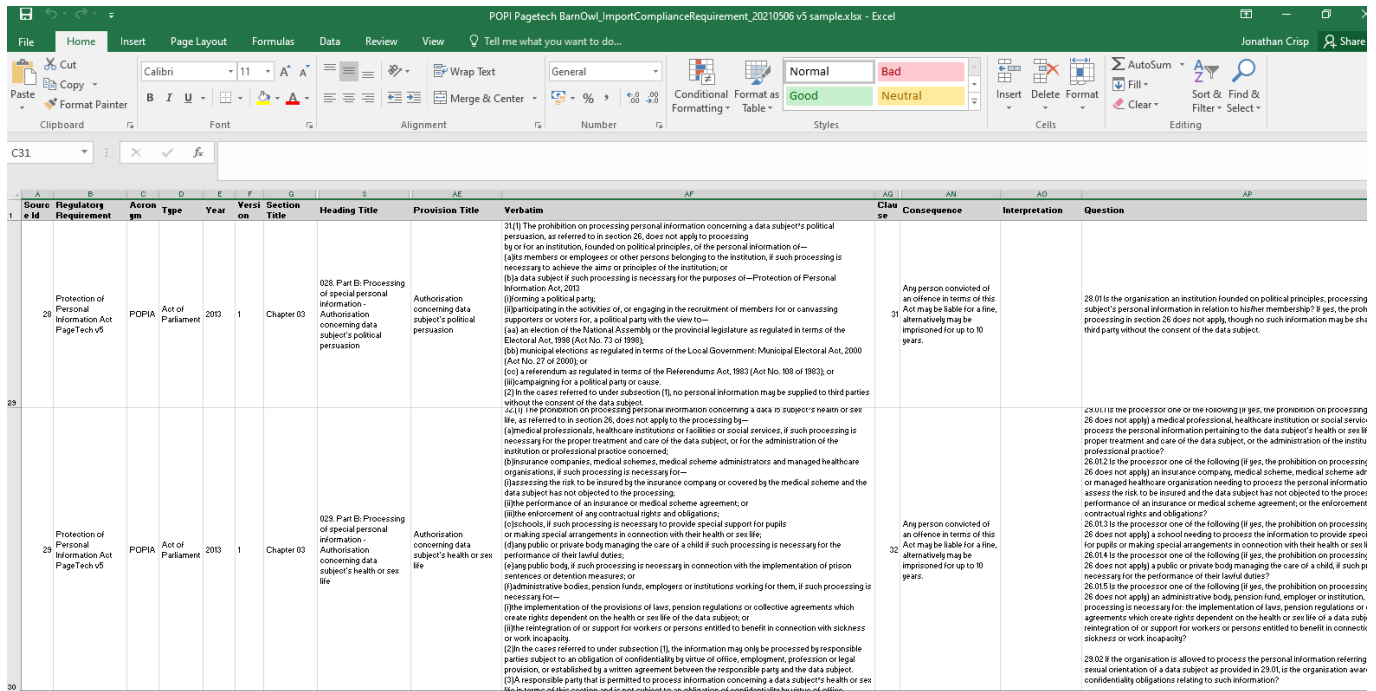
- BarnOwl is able to import compliance acts (in specified format from Excel) with details (sections, heading, provision, analysis, consequence, compliance questions etc.) into a structured CRMP (compliance risks management plan) as well as import compliance checklists from Excel. With respect to compliance content, you can populate the acts yourself or use a 3rd party service provider such as PaigeLaw. Compliance content is priced separately by the 3rd party compliance provider.
- After importing the acts, you can apply the relevant legislation (provisions) to your organisational structure to create compliance risk registers (CRMPs) to which you can add controls and action plans (which can be updated online by the owners of the action plans)
- You can send out compliance checklists to the relevant respondents to be completed online.
- You can capture non-compliance incidents against compliance risks: e.g. (i.e. loss events, forensics, findings, gifts register, burglaries / robberies, tip offs, allegations, conflict of interest etc. including 'user-defined' fields) and associated action plans.
- You can export compliance registers and generate compliance reports directly into Excel.
- The BarnOwl business intelligence reporting module provides advanced graphical dashboard reporting.

You can find more information on BarnOwl at [www.barnowl.co.za](http://www.barnowl.co.za) and more specifically <https://barnowl.co.za/solutions/compliance-software>

## 2. Capturing or importing acts from BarnOwl's excel template

You can import various acts (including provisions / obligations, verbatim text, interpretation and survey questions) using BarnOwl's regulatory Excel template. You can (a) purchase pre-populated regulatory content from our 3<sup>rd</sup> party content provider/s and/or (b) capture your own regulatory content into BarnOwl's Excel template for import into BarnOwl and/or (c) capture regulatory acts and associated detail directly into BarnOwl:

### Example of the BarnOwl's regulatory Excel template:



Source	Regulatory Requirement	Act	Type	Year	Version	Section	Heading Title	Provision Title	Verbatim	Clause	Consequence	Interpretation	Question
28	Protection of Personal Information Act PageTech v5	POPIA	Act of Parliament	2013	1	Chapter 03	028. Part B: Processing of special personal information - Authorization concerning data subject's political persuasion	Authorization concerning data subject's political persuasion	31(1) The prohibition on processing personal information concerning a data subject's political persuasion, as referred to in section 26, does not apply to processing by or for an institution, founded on political principles, of the personal information of— (a) its members or employees or other persons belonging to the institution, if such processing is necessary to achieve the aims or purposes of the institution; or (b) a data subject if such processing is necessary for the purposes of—Protection of Personal Information Act, 2013 (1) (i) forming a political party; (ii) participating in the activities of, or engaging in the recruitment of members for or canvassing supporters or voters for, a political party with the view to— (a) an election of the National Assembly or the provincial legislature as regulated in terms of the Electoral Act, 1998 (Act No. 73 of 1998); (b) municipal elections as regulated in terms of the Local Government: Municipal Electoral Act, 2000 (Act No. 27 of 2000) or (c) a referendum as regulated in terms of the Referendums Act, 1983 (Act No. 108 of 1983); or (ii) campaigning for a political party or cause; (2) In the cases referred to under subsection (1), no personal information may be supplied to third parties without the consent of the data subject. 24(1) The prohibition on processing personal information concerning a data subject's name or sex life, as referred to in section 26, does not apply to the processing by— (1) medical professionals, healthcare institutions or facilities or social services, if such processing is necessary for the proper treatment and care of the data subject, or for the administration of the institution or professional practice concerned; (2) insurance companies, medical schemes, medical scheme administrators and managed healthcare organisations, if such processing is necessary for— (i) assessing the risk to be insured by the insurance company or covered by the medical scheme and the data subject has not objected to the processing; (ii) the performance of an insurance or medical scheme agreement; or (iii) the enforcement of any contractual rights and obligations; (3) schools, if such processing is necessary to provide special support for pupils or making special arrangements in connection with their health or sex life; (4) any public or private body managing the care of a child if such processing is necessary for the performance of their lawful duties; (5) any public body, if such processing is necessary in connection with the implementation of prison sentences or detention measures; or (6) administrative bodies, pension funds, employers or institutions working for them, if such processing is necessary for— (i) the implementation of the provisions of laws, pension regulations or collective agreements which create rights dependent on the health or sex life of the data subject; or (ii) the reintegration of or support for workers or persons entitled to benefit in connection with sickness or work incapacity; (2) In the cases referred to under subsection (1), the information may only be processed by responsible parties subject to an obligation of confidentiality by virtue of office, employment, profession or legal position, or established by a written agreement between the responsible party and the data subject. (3) A responsible party that is permitted to process information concerning a data subject's health or sex life, in terms of this section, and is not subject to an obligation of confidentiality by virtue of office,	31	Any person convicted of an offence in terms of this Act may be liable for a fine, alternatively may be imprisoned for up to 10 years.	28.01 Is the organisation an institution founded on political principles, processing subject's personal information in relation to his/her membership? If yes, the prohibition on processing in section 26 does not apply, though no such information may be shared with third parties without the consent of the data subject.	
29	Protection of Personal Information Act PageTech v5	POPIA	Act of Parliament	2013	1	Chapter 03	028. Part B: Processing of special personal information - Authorization concerning data subject's health or sex life	Authorization concerning data subject's health or sex life	32 (1) Any person convicted of an offence in terms of this Act may be liable for a fine, alternatively may be imprisoned for up to 10 years.	32	Any person convicted of an offence in terms of this Act may be liable for a fine, alternatively may be imprisoned for up to 10 years.	28.02 Is the processor one of the following (if yes, the prohibition on processing 26 does not apply) a medical professional, healthcare institution or social service process the personal information pertaining to the data subject's health or sex life for proper treatment and care of the data subject, or the administration of the institution or professional practice? 28.02 Is the processor one of the following (if yes, the prohibition on processing 26 does not apply) an insurance company, medical scheme, medical scheme administrator or managed healthcare organisation needing to process the personal information to assess the risk to be insured and the data subject has not objected to the processing of an insurance or medical scheme agreement, or the enforcement of contractual rights and obligations? 28.03 Is the processor one of the following (if yes, the prohibition on processing 26 does not apply) a school needing to process the information to provide special support for pupils or making special arrangements in connection with their health or sex life? 28.04 Is the processor one of the following (if yes, the prohibition on processing 26 does not apply) a public or private body managing the care of a child, if such processing is necessary for the performance of their lawful duties? 28.05 Is the processor one of the following (if yes, the prohibition on processing 26 does not apply) an administrative body, pension fund, employer or institution, processing necessary for the implementation of laws, pension regulations or collective agreements which create rights dependent on the health or sex life of a data subject, reintegration of or support for workers or persons entitled to benefit in connection with sickness or work incapacity? 28.02 If the organisation is allowed to process the personal information referring sexual orientation of a data subject as provided in 28.01 in the organisation was confidentiality obligations relating to such information?	



### Imported into the BarnOwl regulatory universe (library)

BarnOwl ERM

File Edit Create/Link View Reports My Favourite Reports Window Help

Regulatory Universe

Regulatory Requirement Register

Lock Register Refresh Expand Register Wrap Text Print Export Register Favourite View Show Filter Close

Drag a column header here to group by that column.

Regulatory Requirement Title	Acronym	Type	Year	Category	M	I	S	P	Risk Rating
PageTech Protection of Personal Information Act	PT POPIA	Acts Of Parliam...	2013		0.00	0.00	0.00	0.00	0.00
Section Title	Heading Title	Provision Title	Provision Clause	Provision Catego...	Provision Verbatim Text	Provision Interpretation	Provision Consequence		
Chapter 1	01. Definitions and Purpose	Definitions	1	Core	1.In this Act, unless the context indi...	It is important to understand the wi...	Any person convicted of a		
Chapter 2	02. Application Provisions	Application and Interpretation of the	3	Core	3.(1) This Act applies to the processi...	Only legislation which is in excess of...	Any person convicted of a		
Chapter 2	03. Application Provisions - Lawful P...	Lawful Processing of personal inform...	4	Core	4.(1) The conditions for the lawful p...	Processing of personal information...	Any person convicted of a		
Chapter 2	04. Application Provisions - Rights of...	Rights of Data Subjects	5	Core	5.A data subject has the right to hav...	Data subjects' personal informatio...	Any person convicted of a		
Chapter 3	05. Conditions for lawful processing...	Responsible party to ensure conditio...	8	Core	8.The responsible party must ensure...	It is the responsible party's obligatio...	Any person convicted of a		
Chapter 3	06. Processing limitation - Lawfulness...	Lawfulness of processing	9	Core	9.Personal information must be proc...		Any person convicted of a		
Chapter 3	07. Processing limitation - Minimality	Minimality	10	Core	10.Personal information may only be...	Where the information col...	Any person convicted of a		
Chapter 3	08. Processing limitation - Consent, j...	Consent, Justification abd objection	11	Core	11.(1) Personal information may onl...	This section sets out the instances in...	Where consent is not pro...		
Chapter 3	09. Processing limitation - Collection...	Collection directly from data subject	12	Core	12.(1) Personal information must be...	Personal information not c...	Any person convicted of a		
Chapter 3	10. Purpose Specification - Collectio...	Collection for specific purpose	13	Core	13.(1) Personal information must be...	Section 18(4) provides: (4)It is not...	Failure to comply with the		
Chapter 3	11. Purpose Specification - Collectio...	Retention and restriction of records	14	Core	14.(1) Subject to subsections (2) an...	Retention of personal info...	Any person convicted of a		
Chapter 3	12. Further processing limitation - F...	Further processing to be compatible...	15	Core	15.(1) Further processing of persona...	Failure to comply with the	Any person convicted of a		
Chapter 3	13. Information quality - Quality of I...	Quality of information	16	Core	16.(1) A responsible party must take...	Failure to comply with the	Any person convicted of a		
Chapter 3	14. Openness - Documentation	Documentation	17	Core	17.A responsible party must maintai...	Failure to comply with the	Any person convicted of a		
Chapter 3	15. Openness - Notification to data s...	Notification to data subject when col...	18	Core	18.(1) If personal information is coll...	Any person convicted of a	Any person convicted of a		
Chapter 3	16. Security Safeguards - Security m...	Security measures on integrity and c...	19	Core	19.(1) A responsible party must sec...	Any person convicted of a	Any person convicted of a		
Chapter 3	17. Security Safeguards - Security m...	Information processed by operator o...	20	Core	20.An operator or anyone processin...	Any person convicted of a	Any person convicted of a		
Chapter 3	18. Security Safeguards - Security m...	Security measures regarding inform...	21	Core	21.(1) A responsible party must, in t...	Any person convicted of a	Any person convicted of a		
Chapter 3	19. Security Safeguards - Notificatio...	Notification of security compromises	22	Core	22.(1) Where there are reasonable g...	Any person convicted of a	Any person convicted of a		

Question

19.01. Is the organisation the responsible party in the circumstances?

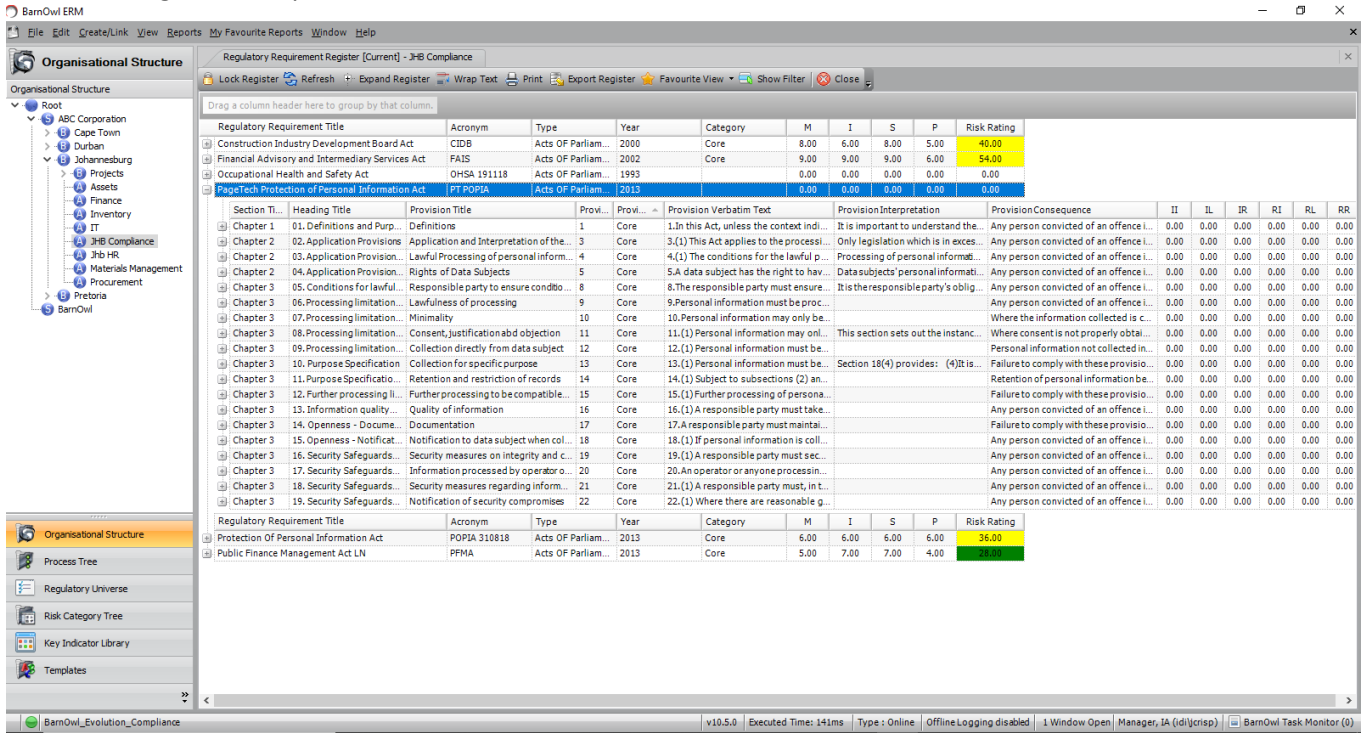
19.02. If Yes to 19.01, does the responsible party have a mechanism in place to ensure that the Regulator and the data subject is advised as soon as reasonably possible of...

19.03. If Yes to 19.02, does the mechanism take into account the requirements of subsections 4 and 5 of section 22?

BarnOwl\_Evolution\_Compliance v10.5.0 Executed Time: 22ms Type : Online Offline Logging disabled 1 Window Open Manager, IA (d/j/crisp) BarnOwl Task Monitor (0)

### 3. Applying acts to your organisational structure

Now you decide which acts and specific provisions apply to your organisation and which business unit/s they apply to. BarnOwl converts these acts into CRMPs (compliance risk management plans) where you are able to rate your compliance risks as well as identify controls and capture 'living' action plans with due dates and ownership. In the following example we have applied a few acts and some specific provisions to the Johannesburg>JHB Compliance unit:



The screenshot displays the 'Regulatory Requirement Register' for the 'JHB Compliance' unit. The interface includes a left-hand navigation tree for 'Organisational Structure' and a main table of regulatory requirements.

Regulatory Requirement Title	Acronym	Type	Year	Category	M	I	S	P	Risk Rating
Construction Industry Development Board Act	CIDB	Acts Of Parliam...	2000	Core	8.00	6.00	8.00	5.00	40.00
Financial Advisory and Intermediary Services Act	FAIS	Acts Of Parliam...	2002	Core	9.00	9.00	9.00	6.00	54.00
Occupational Health and Safety Act	OHS Act 191118	Acts Of Parliam...	1993		0.00	0.00	0.00	0.00	0.00
Protection of Personal Information Act	PT POPIA	Acts Of Parliam...	2013		0.00	0.00	0.00	0.00	0.00

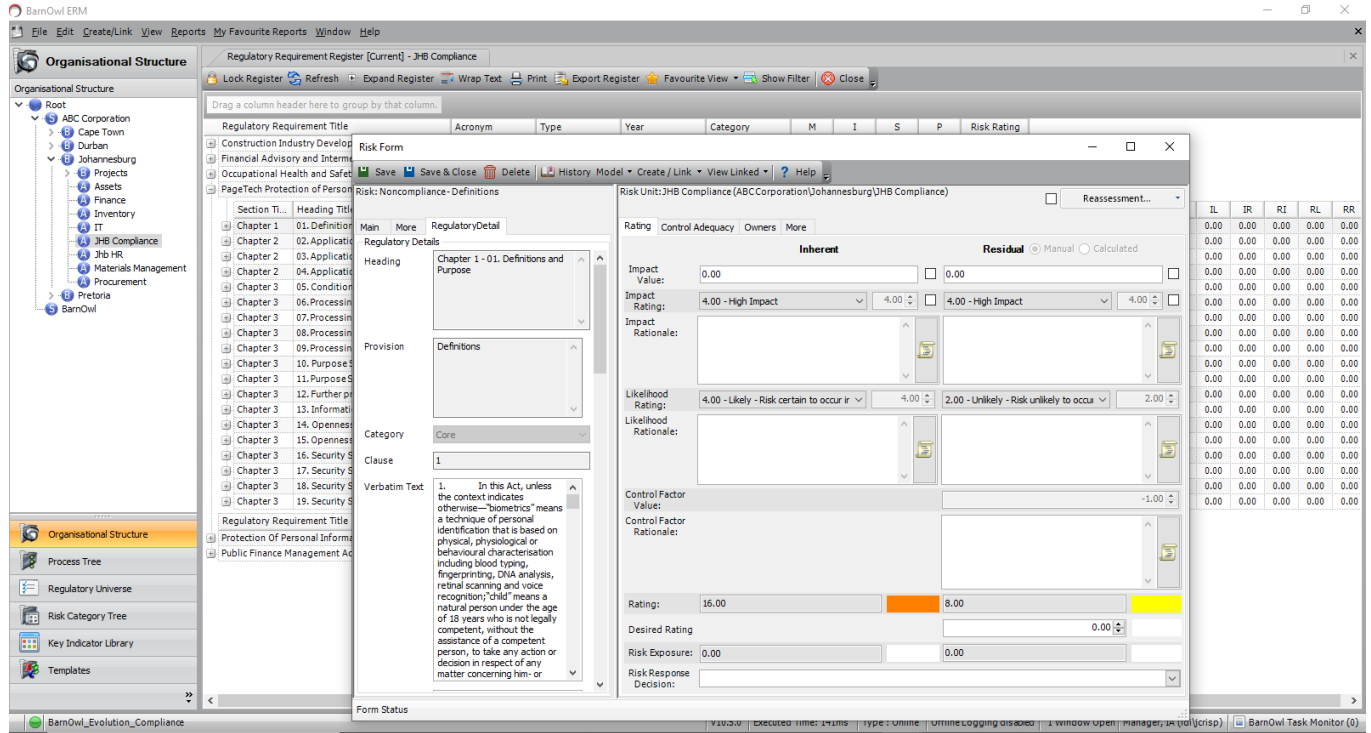
Section Title	Heading Title	Provision Title	Provi...	Provi...	Provision Verbatim Text	Provision Interpretation	Provision Consequence	II	IL	IR	RI	RL	RR
Chapter 1	01. Definitions and Purp...	Definitions	1	Core	1.In this Act, unless the cont...	It is important to understand the...	Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 2	02. Application Provisions	Application and Interpretation of the...	3	Core	3.(1) This Act applies to the process...	Only legislation which is in exce...	Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 2	03. Application Provision	Lawful Processing of personal inform...	4	Core	4.(2) The conditions for the lawfu l...	Processing of personal informati...	Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 2	04. Application Provision	Rights of Data Subjects	5	Core	5.A data subject has the right to hav...	Data subjects' personal informati...	Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	05. Conditions for lawful...	Responsible party to ensure conditio...	8	Core	8.The responsible party must ensure...	It is the responsible party's oblig...	Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	06.Processing limitation...	Lawfulness of processing	9	Core	9.Personal information must be proc...		Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	07.Processing limitation...	Minimality	10	Core	10.Personal information may only be...		Where the information collected is c...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	08.Processing limitation...	Consent, justification abd objection	11	Core	11.(1) Personal information may onl...	This section sets out the instanc...	Where consent is not properly obtai...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	09.Processing limitation...	Collection directly from data subject	12	Core	12.(1) Personal information must be...		Personal information not collected in...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	10. Purpose Specification	Collection for specific purpose	13	Core	13.(1) Personal information must be...	Section 18(4) provides: (4)It is...	Failure to comply with these provisio...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	11. Purpose Specification	Retention and restriction of records	14	Core	14.(1) Subject to subsections (2) an...		Retention of personal information be...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	12. Further processing ll...	Further processing to be compatible...	15	Core	15.(1) Further processing of persona...		Failure to comply with these provisio...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	13. Information quality...	Quality of information	16	Core	16.(1) A responsible party must take...		Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	14. Openness - Docume...	Documentation	17	Core	17.A responsible party must maintai...		Failure to comply with these provisio...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	15. Openness - Notificat...	Notification to data subject when col...	18	Core	18.(1) If personal information is coll...		Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	16. Security Safeguards...	Security measures on integrity and c...	19	Core	19.(1) A responsible party must sec...		Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	17. Security Safeguards...	Information processed by operator o...	20	Core	20.An operator or anyone processin...		Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	18. Security Safeguards...	Security measures regarding inform...	21	Core	21.(1) A responsible party must, in t...		Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00
Chapter 3	19. Security Safeguards...	Notification of security compromises	22	Core	22.(1) Where there are reasonable g...		Any person convicted of an offence l...	0.00	0.00	0.00	0.00	0.00	0.00

Regulatory Requirement Title	Acronym	Type	Year	Category	M	I	S	P	Risk Rating
Protection of Personal Information Act	POPIA 310818	Acts Of Parliam...	2013	Core	6.00	6.00	6.00	6.00	36.00
Public Finance Management Act LN	PFMA	Acts Of Parliam...	2013	Core	5.00	7.00	7.00	4.00	35.00

## 4. View and rate your Compliance Risk Management Plans (CRMPs)

Double click on the relevant risk (non-compliance to the provision) to view (Regulatory Detail tab) and rate the risk in terms of inherent (pre controls) and residual rating (after controls):

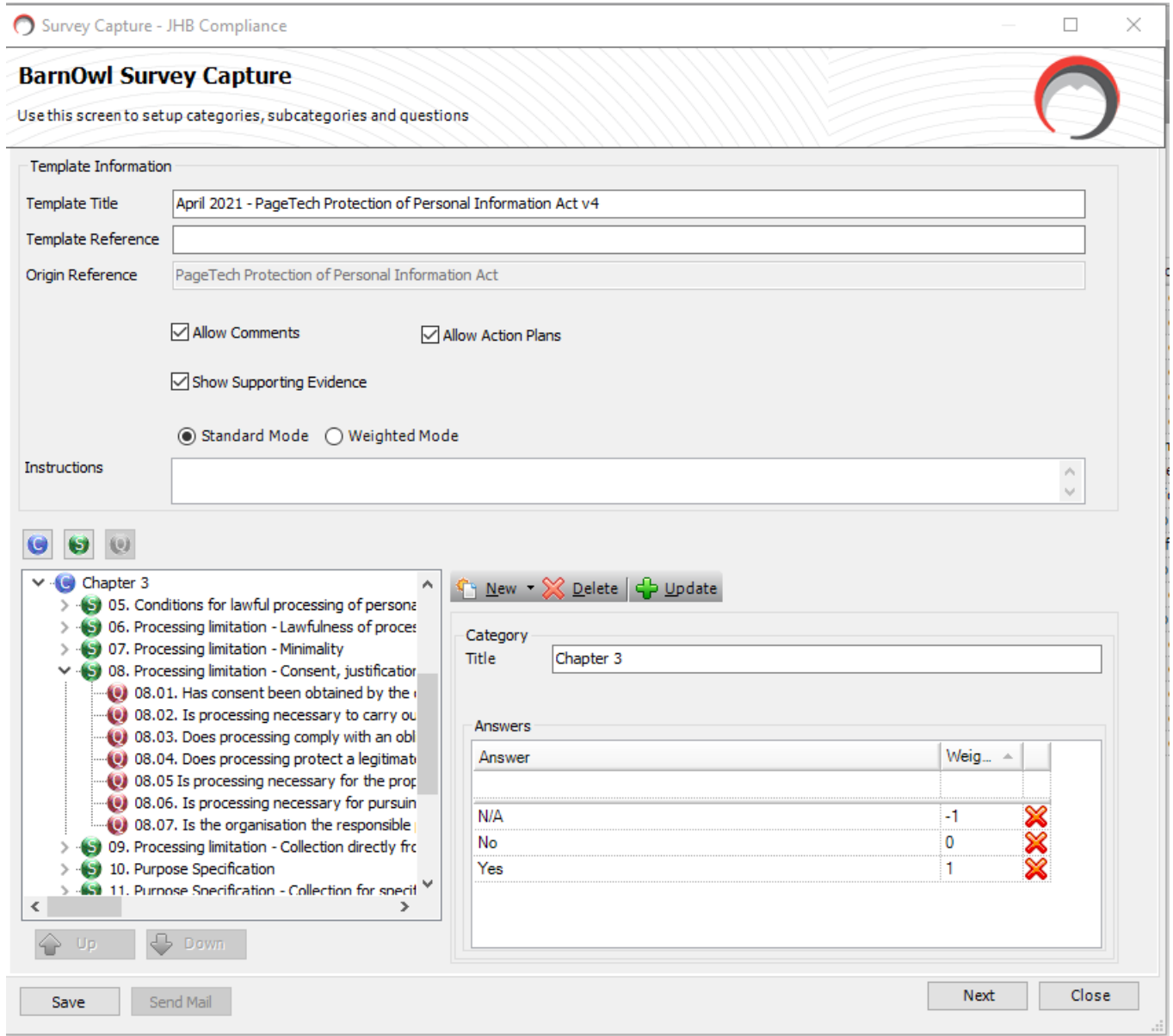


The screenshot displays the BarnOwl ERM interface. On the left, the 'Organisational Structure' tree shows a hierarchy including ABC Corporation, Cape Town, Durban, Johannesburg, Projects, Assets, Finance, Inventory, IT, JHB Compliance, Jhb HR, Materials Management, Procurement, Pretoria, and BarnOwl. The main window is titled 'Regulatory Requirement Register [Current] - JHB Compliance'. It features a table with columns for 'Regulatory Requirement Title', 'Acronym', 'Type', 'Year', 'Category', 'M', 'I', 'S', 'P', and 'Risk Rating'. A 'Risk Form' window is open over the table, showing details for 'Risk: Noncompliance-Definitions'. The form includes tabs for 'Main', 'More', and 'RegulatoryDetail'. The 'RegulatoryDetail' tab is active, showing 'Chapter 1 - 01. Definitions and Purpose' under 'Regulatory Details', 'Definitions' under 'Provision', 'Core' under 'Category', and '1' under 'Clause'. The 'Verbatim Text' field contains the text: '1. In this Act, unless the context indicates otherwise—"biometrics" means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition; "child" means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him- or her.' The 'Rating' section shows 'Inherent' and 'Residual' ratings, both set to '4.00 - High Impact'. The 'Control Factor Value' is '-1.00', resulting in a 'Rating' of '16.00' (highlighted in orange) and a 'Desired Rating' of '0.00'. A table on the right side of the form shows various risk metrics (IL, IR, RI, RL, RR) all set to '0.00'.

## 5. Creating and sending out compliance checklists

### Create a checklist / survey

Create a checklist automatically from the imported act with the questions per provision:



**BarnOwl Survey Capture**  
Use this screen to setup categories, subcategories and questions

**Template Information**

Template Title: April 2021 - PageTech Protection of Personal Information Act v4  
 Template Reference:   
 Origin Reference: PageTech Protection of Personal Information Act

Allow Comments       Allow Action Plans  
 Show Supporting Evidence

Standard Mode     Weighted Mode

Instructions:   
 [Empty text area]

---

**Chapter 3**

- > 05. Conditions for lawful processing of personal information
- > 06. Processing limitation - Lawfulness of processing
- > 07. Processing limitation - Minimality
- ▼ 08. Processing limitation - Consent, justification
  - 08.01. Has consent been obtained by the person concerned?
  - 08.02. Is processing necessary to carry out a contract with the data subject?
  - 08.03. Does processing comply with an obligation of law?
  - 08.04. Does processing protect a legitimate interest of the controller or of a third party?
  - 08.05. Is processing necessary for the purposes of legitimate interests pursued by the controller or by a third party?
  - 08.06. Is processing necessary for pursuing a substantial public interest?
  - 08.07. Is the organisation the responsible party?
- > 09. Processing limitation - Collection directly from the data subject
- > 10. Purpose Specification
- > 11. Purpose Specification - Collection for specific purposes

**Category**  
Title: Chapter 3

**Answers**

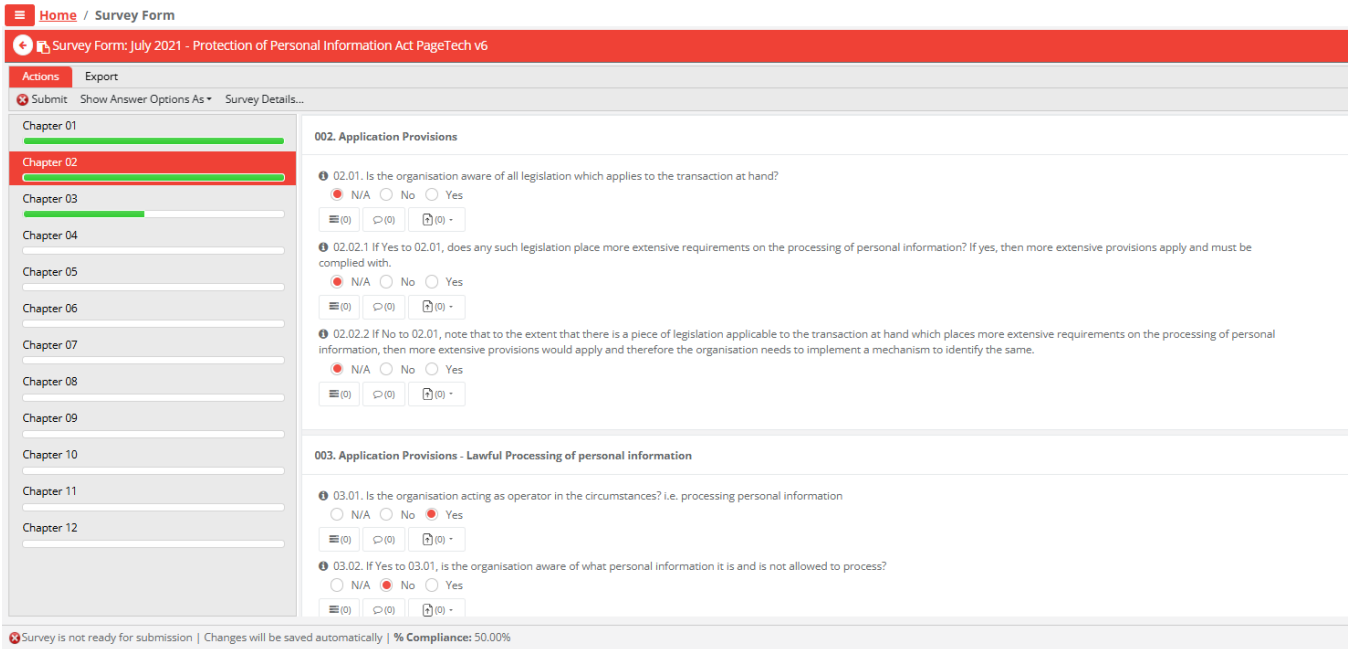
Answer	Weight	
N/A	-1	✗
No	0	✗
Yes	1	✗

Buttons: Save, Send Mail, Next, Close



### Send out the checklist / survey to the relevant recipients (owners)

The system sends out an email with a web link to each recipient to complete his / her checklist/s online and capture action plans where there is non-compliance:

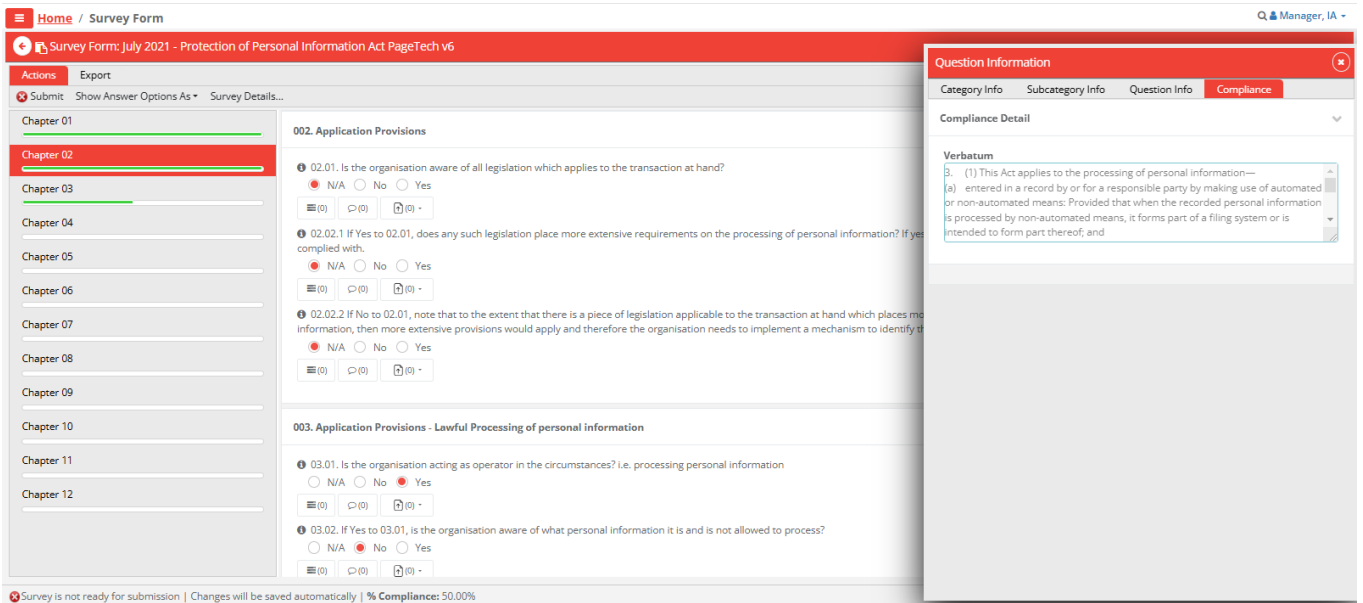


The screenshot shows a web interface for a survey form titled "Survey Form: July 2021 - Protection of Personal Information Act PageTech v6". On the left, there is a sidebar with a progress bar for 12 chapters, with Chapter 02 highlighted in red. The main content area displays two sections of questions:

- 002. Application Provisions**
  - 02.01. Is the organisation aware of all legislation which applies to the transaction at hand? (Radio buttons: N/A, No, Yes)
  - 02.02.1 If Yes to 02.01, does any such legislation place more extensive requirements on the processing of personal information? If yes, then more extensive provisions apply and must be complied with. (Radio buttons: N/A, No, Yes)
  - 02.02.2 If No to 02.01, note that to the extent that there is a piece of legislation applicable to the transaction at hand which places more extensive requirements on the processing of personal information, then more extensive provisions would apply and therefore the organisation needs to implement a mechanism to identify the same. (Radio buttons: N/A, No, Yes)
- 003. Application Provisions - Lawful Processing of personal information**
  - 03.01. Is the organisation acting as operator in the circumstances? i.e. processing personal information (Radio buttons: N/A, No, Yes)
  - 03.02. If Yes to 03.01, is the organisation aware of what personal information it is and is not allowed to process? (Radio buttons: N/A, No, Yes)

At the bottom of the interface, a status bar indicates: "Survey is not ready for submission | Changes will be saved automatically | % Compliance: 50.00%

The user can click on 'Compliance' to see the verbatim text per question:



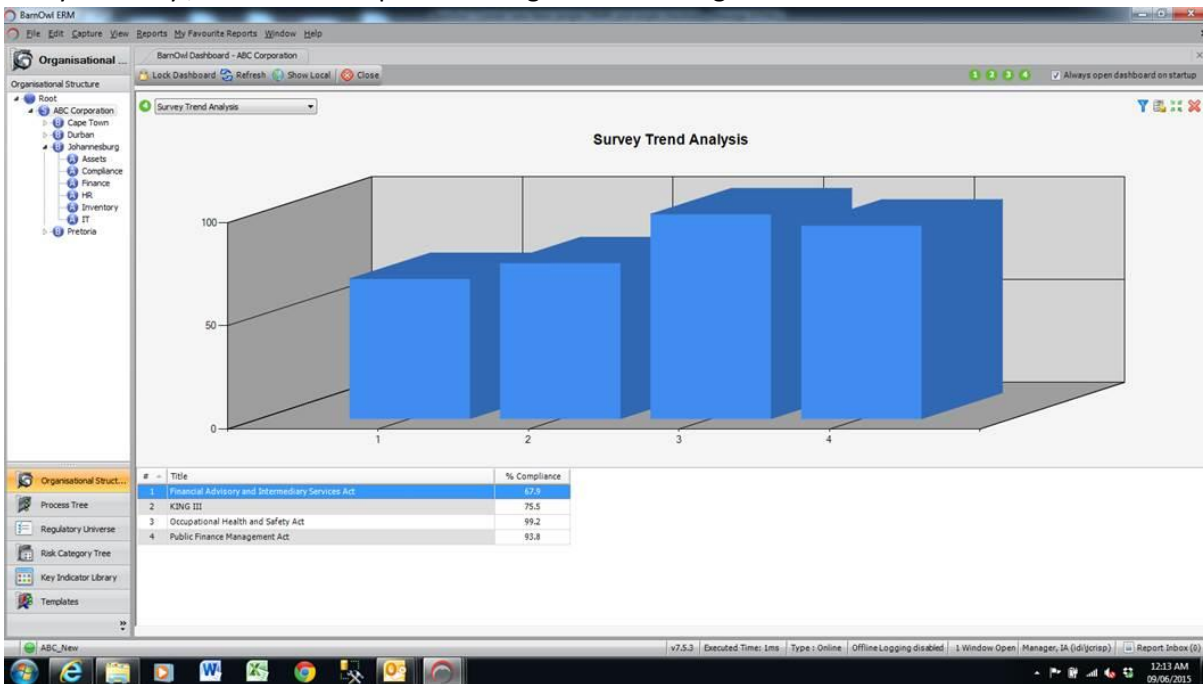
This screenshot shows the same survey form interface as above, but with a "Question Information" popup window open on the right side. The popup has tabs for "Category Info", "Subcategory Info", "Question Info", and "Compliance". The "Compliance" tab is selected, showing a "Compliance Detail" section with a "Verbatim" text area. The verbatim text for question 03.01 is:

3. (1) This Act applies to the processing of personal information—  
 (a) entered in a record by or for a responsible party by making use of automated or non-automated means: Provided that when the recorded personal information is processed by non-automated means, it forms part of a filing system or is intended to form part thereof; and

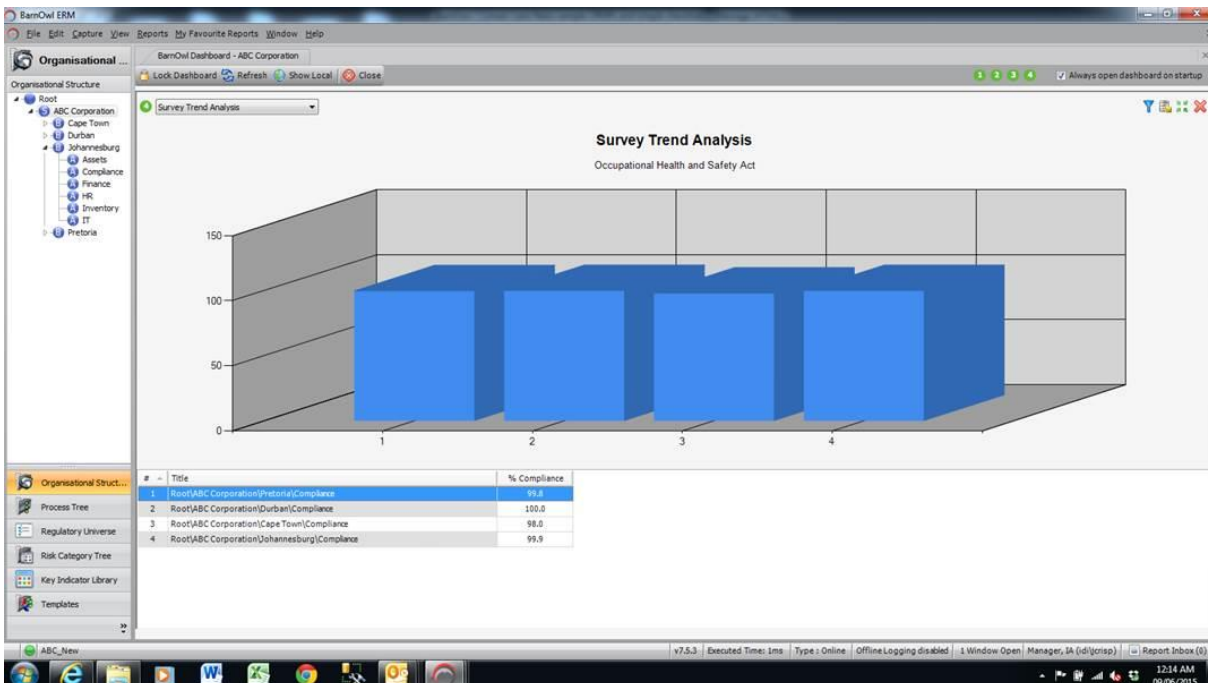
The background survey form shows that question 03.01 is now selected, with the "Yes" radio button checked. The status bar at the bottom remains: "Survey is not ready for submission | Changes will be saved automatically | % Compliance: 50.00%

### Analyse compliance checklist ratings

Analyse survey / checklists compliance ratings across the organisation:

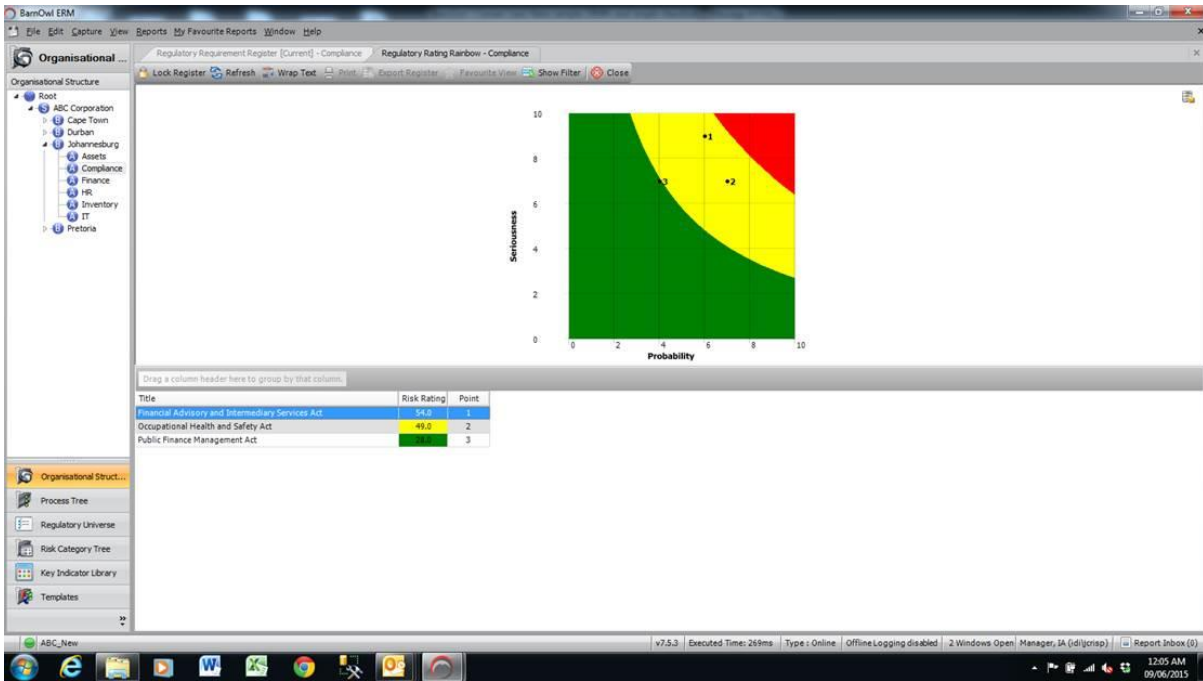


With drill down into an act (e.g. OHASA):

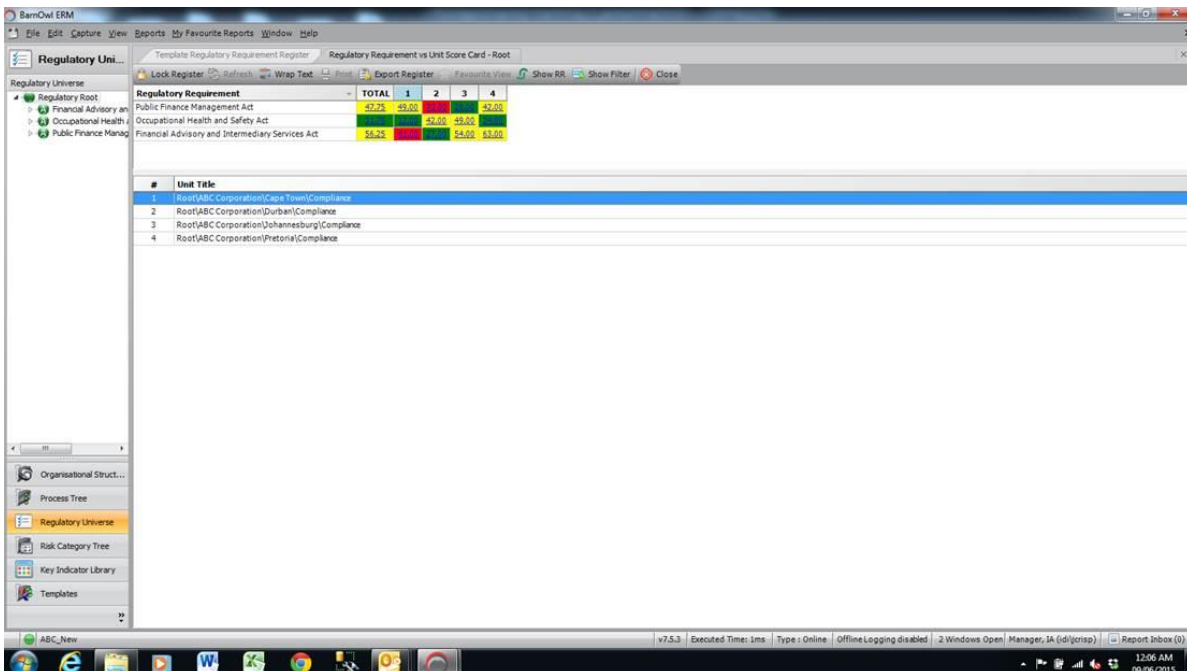


## 6. Reporting

### 'Rainbow' rating of all acts across your organisation:



### Score card of the act ratings as well as the aggregated compliance risk ratings across your organisation:





Survey analysis

BarnOwl Evolution															
Survey Trend Analysis Report															
Origin Reference	KING III														
Score Origin	Voted Users														
Parent Unit	Unit	Survey Title	Start Date	End Date	%	1. Ethical Leadership and Corporate Citizenship	2. Boards and Directors	3. Risk and Audit Committee	3.Risk and Audit Committee	4. The Governance of Risk	5. The Governance of Information Technology	6. Compliance with laws, rules, codes and standards	7. Internal Audit	8. Governing stakeholder relationship and Disclosure	
ABC Corporation	Bloemfontein (100.0%)	KING III 2014	17/01/2014	31/12/2014	78.477	66.67	71.43	100	100	80	75	50	100	75	66.67
ABC Corporation	Cape Town (100.0%)	KING III 2014	17/01/2014	31/12/2014	81	100.00	75.00	75	0	100	80	100	100	80	100
ABC Corporation	Durban (100.0%)	KING III 2014	17/01/2014	31/12/2014	67	33.33	70.00	66.67	0	100	83.33	75	75	66.67	100
ABC Corporation	Johannesburg (100.0%)	KING III 2014	17/01/2014	25/09/2015	72.166	33.33	83.33	80	100	50	100	75	100	66.67	33.33
ABC Corporation	Johannesburg (100.0%)	King III 2016	05/03/2019	12/03/2019	68.63	66.67	62.96	100	40	50	100	0	100	100	66.67
ABC Corporation	Johannesburg (100.0%)	KING III 2016 Q3	09/02/2016	09/09/2016	67.644	66.67	64.29	66.67	0	80	57.14	75	100	100	66.67

BarnOwl Evolution															
Survey Trend Analysis Report															
Origin Reference	KING III														
Score Origin	Voted Users														
Parent Unit	Unit	Survey Title	Start Date	End Date	%	1. Ethical Leadership and Corporate Citizenship	2. Boards and Directors	3. Risk and Audit Committee	3.Risk and Audit Committee	4. The Governance of Risk	5. The Governance of Information Technology	6. Compliance with laws, rules, codes and standards	7. Internal Audit	8. Governing stakeholder relationship	Inte Rep Disc
ABC Corporation	(100.0%)	KING III 2014	17/01/2014	31/12/2014	78.48	66.67	71.43	100.00	100.00	80.00	75.00	50.00	100.00	75.00	75.00
ABC Corporation	(100.0%)	KING III 2014	17/01/2014	31/12/2014	81	100.00	75.00	75.00	0.00	100.00	80.00	100.00	100.00	80.00	80.00
ABC Corporation	(100.0%)	KING III 2014	17/01/2014	31/12/2014	67	33.33	70.00	66.67	0.00	100.00	83.33	75.00	75.00	66.67	66.67
ABC Corporation	(100.0%)	KING III 2014	17/01/2014	25/09/2015	72.17	33.33	83.33	80.00	100.00	50.00	100.00	75.00	100.00	100.00	66.67
ABC Corporation	(100.0%)	King III 2016	05/03/2019	12/03/2019	68.63	66.67	62.96	100.00	40.00	50.00	100.00	0.00	100.00	100.00	100.00
ABC Corporation	(100.0%)	KING III 2016 Q3	09/02/2016	09/09/2016	67.64	66.67	64.29	66.67	0.00	80.00	57.14	75.00	100.00	100.00	100.00

BarnOwl Evolution															
Survey Trend Analysis Report															
Reference	KING III														
Score Origin	Voted Users														
Parent Unit	Unit	Survey Title	Start Date	End Date	%	1. Ethical Leadership and Corporate Citizenship	2. Boards and Directors	2. Boards and Directors	2. Boards and Directors	2. Boards and Directors	2. Boards and Directors	2. Boards and Directors	2. Boards and Directors	2. Boards and Directors	2. Boards and Directors
Corporation	(100.0%)	KING III 2014	17/01/2014	31/12/2014	76.32	0	100	100	100	100	100	100	100	100	100
Corporation	(100.0%)	KING III 2014	17/01/2014	31/12/2014	85.29	100	100	100	100	100	100	100	100	100	100
Corporation	(100.0%)	KING III 2014	17/01/2014	31/12/2014	73.33	0	0	100	100	100	100	100	100	100	100
Corporation	(100.0%)	KING III 2014	17/01/2014	25/09/2015	70.59	0	100	100	100	100	100	100	100	100	100
Corporation	(100.0%)	King III 2016	05/03/2019	12/03/2019	66.05	100	100	0	100	100	0	100	100	100	100
Corporation	(100.0%)	KING III 2016 Q3	09/02/2016	09/09/2016	72.13	100	100	0	100	100	0	100	100	100	100

**'Flat' CRMP export into Excel**

BarnOwl Evolution										Compliance Dashboard Report		
Unit	Compliance Requirement	Section	Heading	Provision	Analysis	Consequence	Risk			Control		
Parent Unit Title	Unit Title	Regulatory Requirement Title	Title	Title	Verbatim		RI	IL	IR	Control Title		
			Chapter III - Representatives of Authorised Financial Services Providers	Qualifications of representatives and duties of authorised financial services provider	13. Qualifications of representatives and duties of authorised financial services providers.—(1) A person may not— (a) carry on business by rendering financial services to clients for or on behalf of any person who— (i) is not authorised as a financial services provider; and (ii) is not exempted from the application of this Act relating to the rendering of a financial service; or (Date of commencement of para. (a): 30 September, 2004.) (b) act as a representative of an authorised financial services provider, unless such person— (i) is able to provide confirmation, certified by the provider, to clients— (aa) that a service contract or other mandate, to represent the provider, exists; and [Item (aa) substituted by s. 52 (a) of Act No. 22 of 2008.] (bb) that the provider accepts responsibility for those activities of the representative performed within the scope of, or in the course of implementing, any such contract or mandate; [Item (bb) substituted by s. 52 (a) of Act No. 22 of 2008.] (ii) if debarred as contemplated in section 14, complies with the requirements determined by the registrar, after consultation with the Advisory Committee, by notice in the Gazette, for the reappointment of a debarred person as a representative. (General Note: Requirements for reappointment of debarred representatives determined under Board Notice 15. Publication of codes of conduct.— (1) (a) The Registrar must, after consultation with the Advisory Committee and	1.) REQUIREMENTS  An authorised FSP must: a) at all times be satisfied that its representatives, and key individuals of those representatives, are competent to act, and comply with the following: i) they are honest and have integrity; ii) they have the competence and operational ability of the applicant to fulfil their responsibilities; iii) if debarred, they comply with the requirements determined by the Registrar, for the reappointment of a debarred person as a representative; and b) take reasonable steps to ensure that representatives comply with any applicable		4.00	5.00	20.00	Review qualifica	

BarnOwl Evolution										Compliance Dashboard Report		
Unit	Compliance Requirement	Section	Heading	Control	Risk			Action Plan				
Parent Unit Title	Unit Title	Regulatory Requirement Title	Title	Control Title	RI	IL	IR	Action Plan Title	Status	Due Date	Action Plan Owners	
			Chapter III - Representatives of Authorised Financial Services Providers	Qualifications of representatives and duties of authorised financial services provider	Review qualifications up-front and on a regular basis	4.00	4.00	16.00	Review qualifications of all representatives of authorised FSP	Half Way	31 July 2015	Manager, Risk (Informed), Manager, IA (Responsible)

**Action plan monitoring and status reporting:**



**BarnOwl Evolution**  
Action Plan per Unit Report

Filters:  
Empty Unit Filter Filter out units with no action plans.

Unit Title	Compliance	Parent Unit Title	Johannesburg
Request investment reports from various fund managers			
Request investment reports from various fund managers			
Check FSB licenses annually			
Test water			
Function and power as specified in policies and procedures not adhered to as per delegated authority rules			

**Action Plan Title**      **Start Date**      **End Date**      **Orig End Date**      **% Complete**      **Action Plan Status**

Request investment reports from various fund managers      27 May 2015      30 Jun 2015      30 Jun 2015      50.00 %      Half Way

**Reference**

**Description**

**Action Plan Owner(s)**      Manager, Risk (Informed); Manager, IA (Responsible)

**Originator**      Manager, IA

**Linked Control Title**      Monitor investment results

**Action Plan Title**      **Start Date**      **End Date**      **Orig End Date**      **% Complete**      **Action Plan Status**

Check FSB licenses annually      06 Apr 2015      31 May 2015      31 May 2015      50.00 %      Half Way

**Reference**

**Description**

**Action Plan Owner(s)**      Manager, IA (Responsible)

**Originator**      Manager, IA

**Linked Control Title**      Check FSB license

**Action Plan Title**      **Start Date**      **End Date**      **Orig End Date**      **% Complete**      **Action Plan Status**

Test water      08 Jan 2014      31 Jan 2014      31 Jan 2014      25.00 %      Started

**Reference**

**Description**

**Action Plan Owner(s)**      Manager, IA (Responsible)

**Originator**      Manager, IA

**Linked Control Title**      Water filters

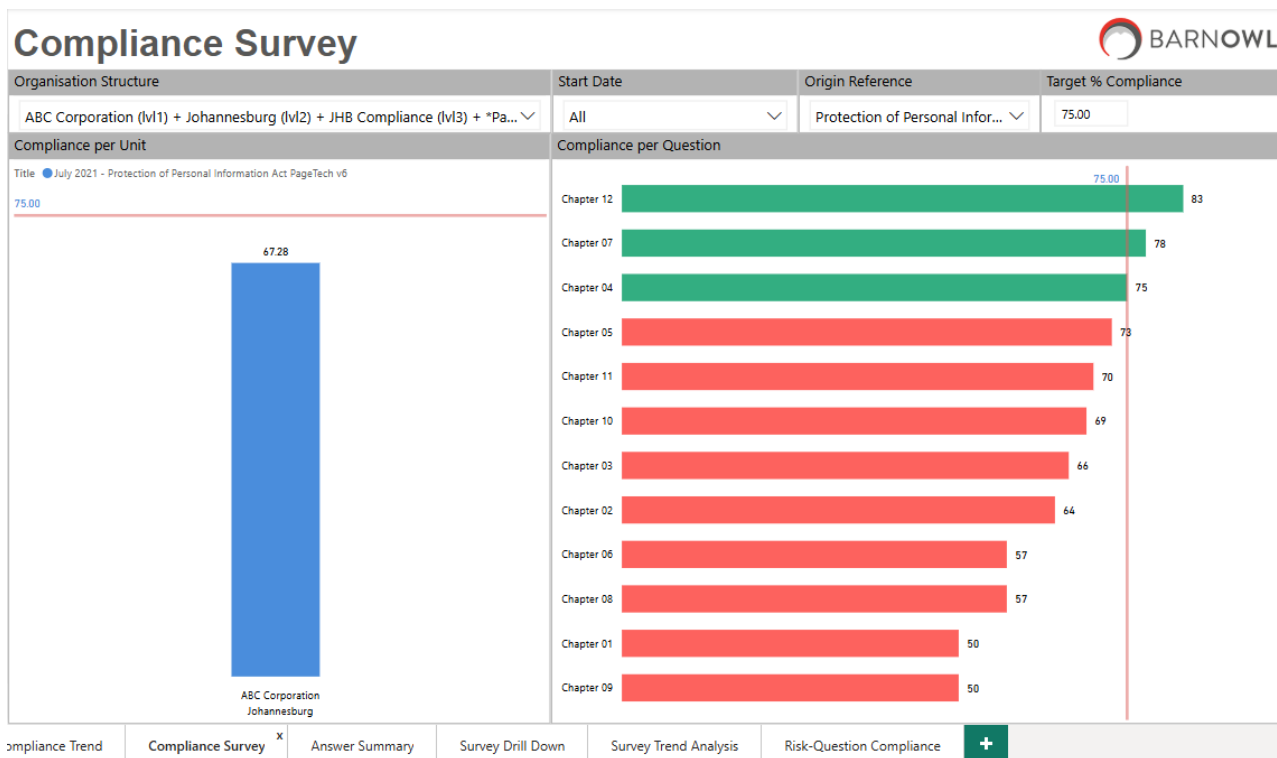
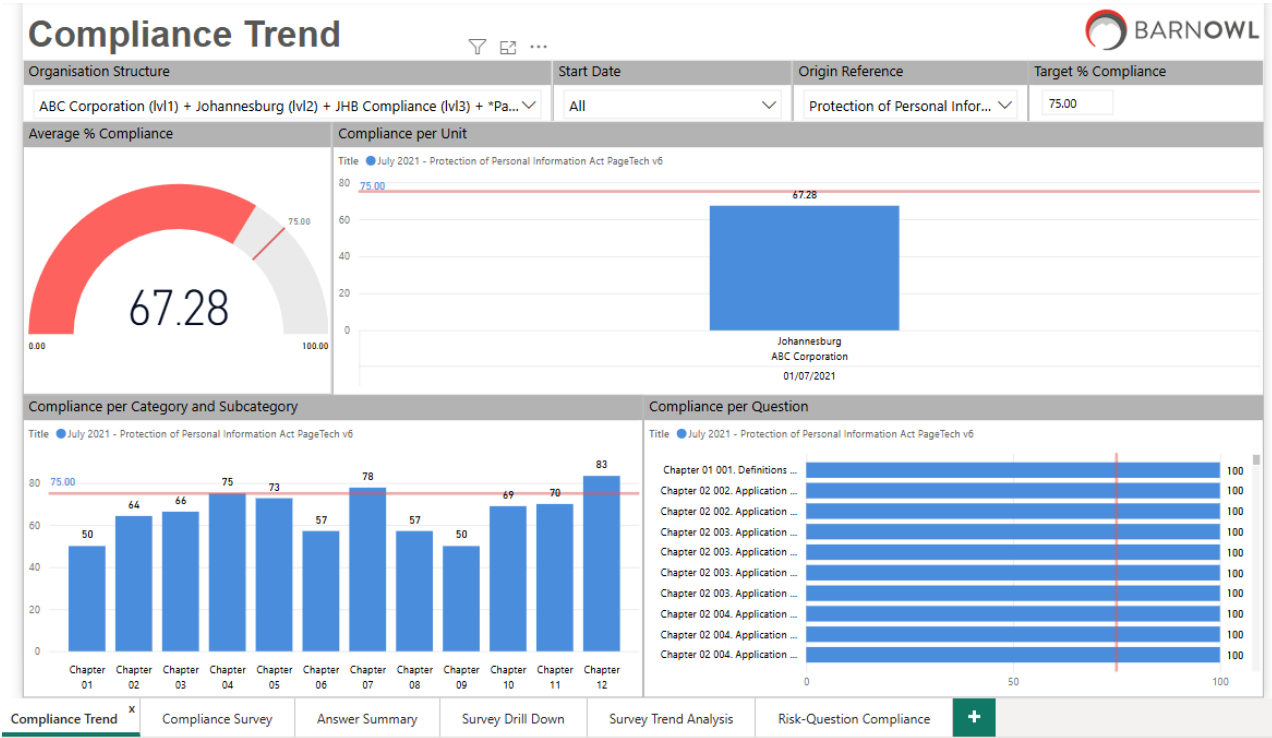
**Action Plan Title**      **Start Date**      **End Date**      **Orig End Date**      **% Complete**      **Action Plan Status**

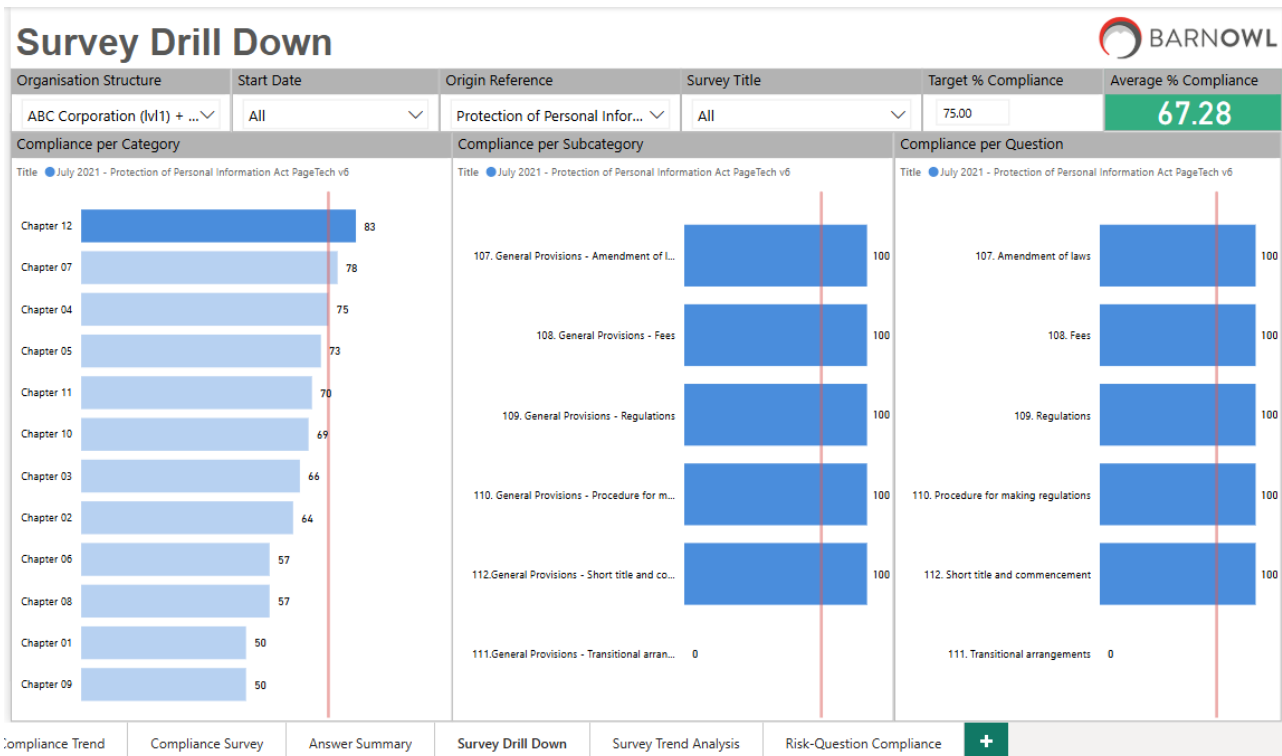
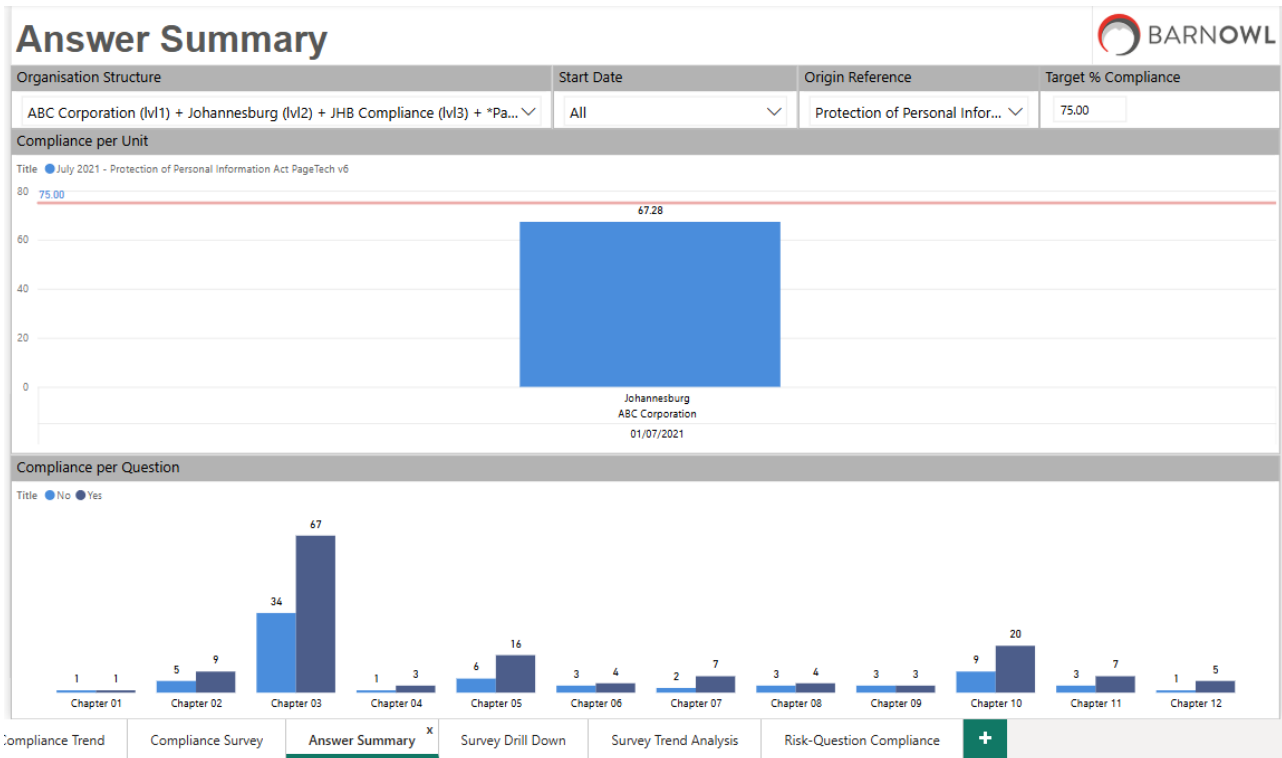
Function and power as specified in policies and procedures not adhered to as per delegated authority rules      17 Feb 2014      26 Mar 2014      26 Mar 2014      0.00 %      Not Started

**Reference**      jhb Compliance 201402

## 7. Business Intelligence dashboards

The BarnOwl Power BI compliance reporting provides advanced graphical dashboard reporting:







## Survey Trend Analysis

Organisation Structure	Start Date	Origin Reference	Survey Title
ABC Corporation (lv1) + Johannesburg (lv2) + J...	All	Protection of Personal Information Act PageTec...	All

Title	Chapter 01	Chapter 02	Chapter 03	Chapter 04	Chapter 05	Chapter 06	Chapter 07	Chapter 08	Chapter 09	Chapter 10	Chapter 11	Chapter 12	Total
July 2021 - Protection of Personal Information Act PageTech v6	50.00	64.29	66.34	75.00	72.73	57.14	77.78	57.14	50.00	68.97	70.00	83.33	67.28
ABC Corporation	50.00	64.29	66.34	75.00	72.73	57.14	77.78	57.14	50.00	68.97	70.00	83.33	67.28
Johannesburg	50.00	64.29	66.34	75.00	72.73	57.14	77.78	57.14	50.00	68.97	70.00	83.33	67.28
JHB Compliance	50.00	64.29	66.34	75.00	72.73	57.14	77.78	57.14	50.00	68.97	70.00	83.33	67.28
<b>Total</b>	<b>50.00</b>	<b>64.29</b>	<b>66.34</b>	<b>75.00</b>	<b>72.73</b>	<b>57.14</b>	<b>77.78</b>	<b>57.14</b>	<b>50.00</b>	<b>68.97</b>	<b>70.00</b>	<b>83.33</b>	<b>67.28</b>

Compliance Trend
Compliance Survey
Answer Summary
Survey Drill Down
Survey Trend Analysis <sup>x</sup>
Risk-Question Compliance
+

## Risk-Question Compliance

Organisation Structure	Start Date	Origin Reference	Survey Title
ABC Corporation (lv1) + Johannesburg (lv2) + JHB Com...	All	Protection of Personal Information A...	July 2021 - Protection of Personal Informati...

UnitPath	RiskTitle	RiskCategory	RiskSubcategory	II	IL	IR	RI	RL	RR	% Compliance
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 017. Information processed by operator or person acting under authority	Regulatory Risk	Protection of Personal Information Act PageTech v6	5.00	4.00	20.00	5.00	3.00	15.00	50.00
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 015. Notification to data subject when collecting personal information	Regulatory Risk	Protection of Personal Information Act PageTech v6	4.00	5.00	20.00	4.00	3.00	12.00	75.00
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 011. Retention and restriction of records	Regulatory Risk	Protection of Personal Information Act PageTech v6	5.00	4.00	20.00	5.00	2.00	10.00	66.67
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 009. Collection directly from data subject	Regulatory Risk	Protection of Personal Information Act PageTech v6	4.00	5.00	20.00	4.00	2.00	8.00	75.00
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 014. Documentation	Regulatory Risk	Protection of Personal Information Act PageTech v6	4.00	3.00	12.00	4.00	2.00	8.00	100.00
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 016. Security measures on integrity and confidentiality of personal information	Regulatory Risk	Protection of Personal Information Act PageTech v6	4.00	5.00	20.00	4.00	2.00	8.00	75.00
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 007. Minimality	Regulatory Risk	Protection of Personal Information Act PageTech v6	5.00	2.00	10.00	5.00	1.00	5.00	0.00
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 006. Lawfulness of processing	Regulatory Risk	Protection of Personal Information Act PageTech v6	4.00	3.00	12.00	4.00	1.00	5.00	100.00
Root\ABC Corporation\Johannesburg\UHB Compliance	Noncompliance - 012. Further processing to be compatible with purpose of collection	Regulatory Risk	Protection of Personal Information Act PageTech v6	4.00	4.00	16.00	4.00	1.00	4.00	71.43
<b>Total</b>				<b>1.02</b>	<b>0.93</b>	<b>3.88</b>	<b>1.02</b>	<b>0.44</b>	<b>1.88</b>	<b>67.28</b>

Compliance per Question
<div style="display: flex; align-items: flex-start;"> <div style="width: 80%; padding-right: 10px;"> <p>01.01. Is the organisation acting as an operator (the processor of personal information for the responsible party)?</p> <p>02.01. Is the organisation aware of all legislation which applies to the transaction at hand?</p> <p>02.02.2 If No to 02.01, note that to the extent that there is a piece of legislation applicable to the transaction at hand which places ...</p> <p>03.01. Is the organisation acting as operator in the circumstances? i.e. processing personal information</p> <p>03.03. Is the operator processing personal information which has been anonymised? If yes, the Act does not apply.</p> <p>03.06. Is the operator a court referred to in section 166 of the Constitution, executing its judicial functions? If yes, the Act does not ...</p> <p>03.07. Is the operator processing the personal information for journalistic, literary or artistic purposes, as set out in section 7 of the ...</p> <p>036. Establishment of Information Regulator</p> <p>038.Appointment, term of office and removal of members of Regulator</p> <p>04.01. Has consent been obtained from the data subject to process the particular personal information being processed? If yes, pro...</p> </div> <div style="width: 20%; text-align: right;"> <p>100</p> <p>100</p> <p>100</p> <p>100</p> <p>100</p> <p>100</p> <p>100</p> <p>100</p> <p>100</p> <p>100</p> </div> </div>

Compliance Trend
Compliance Survey
Answer Summary
Survey Drill Down
Survey Trend Analysis
Risk-Question Compliance <sup>x</sup>
+