

PAIA MANUAL

Prepared in terms of Section 51 or the Promotion of Access to Information Act 2 of 2000 (as amended)

SOUTHCITY CHRISTIAN SCHOOLS

Southcity Christian College Trading as Southcity Christian Schools



Date of Compilation: November 2021

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1. List of Acronyms:

“IO“	Information Officer;
“DIO”	Deputy Information Officer;
“Minister”	Minister of Justice and Correctional Services;
“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as amended);
“POPIA”	Protection of Personal Information Act No.4 of 2013;
“Regulator”	Information Regulator; and
“Republic”	Republic of South Africa

2. Introduction:

The Promotion of Access to Information Act 2 of 2000 gives effect to the constitutional right of access to any information held by the state, or any information that is held by another person and that is required for the exercise or protection of any rights. In addition, this Manual informs data subjects if any information is transferred or processed outside the Republic of South Africa and to whom the personal information is supplied. It further seeks to inform the public whether the Schools have appropriate security measures to ensure confidentiality, integrity and availability of the personal information to be processed.

In terms of the Act, the head of a private body must compile a manual that must contain information regarding the subjects (pupils, parents and staff) and categories of records held by such private bodies. In this context, a "private body" is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g. any company, close corporation or business trust). Southcity Christian Schools fall into the definition of a "private body" and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognises that access to information can be limited. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance. Accordingly, this manual provides a reference to the records held by Southcity Christian Schools and the process that needs to be adopted to access such records. All requests for access to information (other than information that is available to the public) must be addressed to the Head of the relevant School named in section 5 of this Manual on Form C attached.

Southcity Christian Schools is a registered independent 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 pertaining to independent schools, as well as the language and admissions policy drafted in terms thereof.

- The medium of instruction at Southcity Christian Schools is English.
- The school offers education from Grades 000 to 12.

3. Key Contact Details for Access to information of Southcity Christian Schools

3.1 Postal address:

PO Box 149, Ramsgate, KwaZuluNatal, 4285.

3.2 Street address:

Corner of Main and Alford Roads, Ramsgate, KwaZuluNatal, 4285.

3.3 Telephone number:

039-3149470

3.4 The information officers of the schools are:

INFORMATION OFFICERS			
College Head	Mrs W. Lourens	collegereception@southcity.org.za	
Preparatory Head	Mrs J. Sparrow	prepreception1@southcity.org.za	
DEPUTY INFORMATION OFFICERS			
Deputy Head College	Mrs J. Bebb	collegedeputy@southcity.org.za	
Deputy Head Preparatory School	Mrs M. Pieterse	prepdeputy@southcity.org.za	

4. PAIA Guide: Guide on how to use PAIA and how to obtain access to the Guide

Link to the PAIA Guide:

justice.gov.za/infocreg/docs/misc/PAIA-Guide-English_20210905.pdf

The management and scope of PAIA from 1st July 2021 now falls under the Department of Justice and the new guidelines and templates have been received from The Regulator.

5. Categories of Records available at Southcity Christian Schools without needing to complete Addendum A to request access:

Category of records	Applicable Legislation	Available on Website	Available upon request
Memorandum of incorporation	Companies Act 71 of 2008		X
PAIA Manual	Promotion of Access to Information Act 2 of 2000	X	
Registration Document	Department of Education, SA Schools Act 84 of 1996, Section 46 (3)		X

Non-Profit Company Registration	Companies and Intellectual Property Commission of SA		X
Non-Profit Organisation Registration	Non-profit Organisation Act, 1997		X
Umalusi Accreditation	General & Further Education & Training Quality Assurance Act No 58 of 2001		X
IEB Registration	Independent Examination Board		X
ISASA Registration	Member of the Independent Schools Association of Southern Africa		X

6. Records of Southcity Christian Schools which are available in accordance with any other legislation

Category of records	Applicable Legislation	Available on Website	Available upon request
Tax Exemption Certificate	South African Revenue Services, Section 18A		X
Health and Safety Compliance certificate	Occupational Health & Safety Act 85 of 1993		X
Workmen's Compensation Letter of good standing	Compensation for Occupational Injuries and Health Diseases Act 130 of 1993		X
Unemployment Insurance Fund	Unemployment Contributions Act 4 of 2002		X
All other statutory requirements	See 8.		X

7. Description of the subjects on which the body holds records and categories of records held on each subject

Subjects on which the body holds records	Categories of Records
Strategic documents, plans, proposals	Quarterly reports, strategic plan
Human Resources	<ul style="list-style-type: none"> ▪ Conditions of Service ▪ Employee Records ▪ Employment Contracts ▪ Employment Equity Records ▪ General Correspondence ▪ Pension and Provident Fund Records ▪ Performance Appraisals ▪ Personnel Guidelines ▪ Policies and Procedures ▪ Remuneration Records and Policies ▪ Salary Surveys ▪ Skills Requirements ▪ Staff Recruitment Policies ▪ Statutory Records Training Records ▪ Operations Brochures on Company Information ▪ Client and Customer Registry Contracts ▪ Duty sheets ▪ Attendance register ▪ General Correspondence
Marketing	<ul style="list-style-type: none"> ▪ Marketing Records ▪ Suppliers' Registry
Finances	<ul style="list-style-type: none"> ▪ Annual Financial Statements ▪ Asset Register ▪ Banking Records ▪ Budgets Contracts ▪ Financial Transactions ▪ General Correspondence ▪ Insurance Information ▪ Internal Audit Records ▪ Management Accounts ▪ Purchase and Order Information ▪ Stock Records Tax Records (company and employee)
Administration	<ul style="list-style-type: none"> ▪ Correspondence ▪ Founding Documents ▪ Licences - Registrations ▪ Minutes of Meetings: Management Meetings and Staff Meetings ▪ Statutory Returns
Executive Board, Headcomm, Advisory Board	<ul style="list-style-type: none"> ▪ Constitution and code of conduct ▪ Language and admissions policies ▪ Other policy documents

	<ul style="list-style-type: none"> ▪ Elections ▪ Minutes of meetings
Information Technology	<ul style="list-style-type: none"> ▪ IT Policies and Procedures & Contracts ▪ Network Diagrams ▪ User Manuals: Front Office Administration Programme, Google, Security Guidance Documents
Service Providers	Names, Registration Number, Address, Bank details

8. Statutory Records:

At present these include records (if any) held in terms of:

- Basic Conditions of Employment 75 of 1997
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Copyright Act 98 of 1978 Debtor Collectors Act 114 of 1998
- Employment Equity Act 55 of 1998
- Electronic Communications and Transactions Act 25 of 2002 Income Tax Act 95 of 1967
- Labour Relations Act 66 of 1995
- Medical Schemes Act 131 of 1998
- Occupational Health & Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- National Credit Act 34 of 2005 Promotion of Access to Information Act 2 of 2000
- Skills Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001

9. Processing of Personal Information

9.1 Purpose of Processing Personal Information

The Schools' Data Protection Policy applies to all personal data held in respect of staff, pupils and parents and other individuals who come into contact with Southcity Christian Schools as third parties. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the schools comply with, which is protected by the Protection of Personal Information Act No.4 of 2013. This policy also encompasses and outlines measures to enhance accountability, security and transparency, giving access to Personal Information as outlined in the Promotion of Access to Information Act No. 2 of 2000.

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
	<ul style="list-style-type: none"> • Application for admission • Waiting list for admission

Pupils	<ul style="list-style-type: none"> • Refusal of applications for admission, and appeals against those • Admissions register on Administration System • Academic records/individual report cards in physical and digital format • Personal files for each learner • Class lists • Class timetables • Assessment details • Question papers, answer papers and memoranda for model answers • Attendance records
Parents	<ul style="list-style-type: none"> ▪ Personal particulars obtained from Admission Forms ▪ Circulars ▪ Correspondence
Staff	<ul style="list-style-type: none"> • All Employee records and information • Police Clearance Certificate • SACE Registration Certificate • Qualifications

9.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks - staff	South African Police Services
Qualifications, for qualification verifications - staff	South African Qualifications Authority
Credit and payment history, for credit information of parents, if necessary	Credit Bureaus
Parent personal details and details of school account for fee collection in the case of non-payment	Lawyer
Pupil name and surname, ID number and other personal details, parent details accessed from Admission forms, entered onto Front Office Administration Programme	IEB, SASAMS, DBE

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Name, Surname, Admin No.	D6, Mathletics, (EGAD, APMaths, APEnglish – College)

9.4 Planned transborder flows of personal information

Information	Country in which information will be stored	Categories
School Webpage	United Kingdom - Global	School contact information, photos, Application Forms, Uniform Information, General information about the Schools, Events, vision & Mission statements, News, Matric passrates, Fees
Front Office	On SCS server – but access from the United Kingdom	Pupil and Parent information. Staff information. Academic records
International Benchmark Tests (IEB)	Australia	Name and Surname of pupils Information required for NSC
3 P Learning Mathletics	USA - Global	Name and Surname of pupils
Google	USA - Global	Information required for Google Classroom Hosting email
School Facebook page	USA - Global	News, Events, Photos, Contact Information, Advertising

9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

All digital data is stored on computers – classroom, workrooms, or, in some instances hard drives or personal computers. All data relating to pupils, parents or staff is backed up to personal files of each educator or administrator on the school server. These personal files are password protected. This system is managed by the IT department who have programmed regular, daily back up of all work on the server.

All manual records are kept under lock and key by the various departments – HR/Finance/Administration/Heads.

ICT Safety Measures for Southcity Schools

These are the safety measures we currently have implemented to safeguard users' personal information from an ICT perspective:

ICT Security:

Passwords: Every computer on campus is password protected and requires a username and password to access it. User credentials are distributed to users by the ICT Administrators. Credentials grant access to certain files and folders to the degree their security permissions permit them. The IT administrators set security permissions and users cannot access work stored on computers without relevant permissions.

Firewalls: The internet runs through two firewall systems, which handle internet speeds, content filtering (blocking pornographic and adult content), and intrusion prevention.

Google Workspace: We use Google Workspace for Education for hosting our email and facilitating distance learning when required. Information is stored securely on Google servers and you access your data over a secured SSL-encrypted connection so no one can access your information.

Backups: Users' data is stored on local servers, which is backed up to multiple locations including cloud storage to create redundancy. Backup reports are kept on file with access only permitted by the IT Administrator.

Anti-virus: Each computer is running anti-virus software from top rated companies and are connected to internet to receive updates regularly. All computers are running up to date windows operating systems that receive regular security updates automatically.

IT security reviews are done quarterly.

10. Information Request Procedure

- The requester must use the prescribed form to make the request for access to a record. Addendum A attached.
- A request form is available from our offices or at www.southcity.org.za, or from the reception offices.
- The request must be directed to the Head of the relevant school as in Section 5 above.
- This request must be made to the address (Section 3) or electronic mail address of the relevant school (Section 3).
- The requester must provide sufficient detail on the request form to enable the Head of the School to identify the record and the requester.
- The requester should also indicate which form of access is required.
- The requester must identify the right that is sought to be exercised or to be protected and must provide an explanation of why the requested record is required for the exercise or protection of that right.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Head of School.
- The prescribed request fee must be paid to the Bursar before the request will be considered.
- The School will respond to your request within 30 days of receiving the request. It will be indicated whether the request for access has been granted or denied.
- It must be noted that the successful completion and submission of a request for access form does not automatically allow the requestor access to the requested record.

11. Manual availability:

A copy of this Manual is available in English:

11.1 on www.southcity.org.za

11.2 upon request, after payment of R50 and a further 50c for each page copied.

11.3 upon request, a copy of the manual is available in the respective administration blocks for reading during office hours (8:00 – 14:30)

12. Access will be granted to a record only if the following criteria are fulfilled:

- The record is required for the exercise or protection of any right; and
- The requestor complies with the procedural requirements set out in the Act relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of the Act.

13. Denial of access to any record may be refused under certain limited circumstances:

These include:

- The protection of personal information from unreasonable disclosure concerning any natural person;
- The Head must refuse a request for access to a record of the body if its disclosure could reasonably be expected to endanger the life or physical safety of an individual;
- The protection of commercial information held concerning any third party;
- The protection of financial, commercial, scientific or technical information that may harm the commercial or financial interests of any third party;
- Disclosures that would result in a breach of a duty of confidence owed to a third party;
- Disclosures that would prejudice or impair the security of property or means of transport;
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- Disclosures that would prejudice or impair the protection of the safety of the public;
- Disclosures that are privileged from production in legal proceedings unless the privilege has been waived;
- Disclosures of details of any computer programme;
- Disclosures that will put Southcity Christian Schools at a disadvantage in contractual negotiations
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interests of Southcity Christian Schools;
- Disclosures of any record containing information about research and development being carried out or about to be carried out by Southcity Christian Schools
- If access to a record or any other relevant information is denied, our response will include:
 - Adequate reasons for the refusal; and
 - Notice that you may lodge an application with the court against the refusal and the procedure including details of the period for lodging the application.

14. Fees:

The applicable fees are prescribed in terms of Part III of Annexure A relating to private bodies as identified in Government Notice Number 187, 15th February 2002, Regulation 11 (p. 13 & 14).

There are two basic types of fees payable in terms of the Act.

Request Fee:

The non-refundable request fee of R 50 is payable on submission of any request for access to any record. This does not apply if the request is for personal records of the requestor. No fee is payable in such circumstances.

Access Fee:

If the request is granted, a further access fee becomes payable for the search for, preparation and reproduction of the information, as well as any time spent on searching for and preparing the record for disclosure in excess of the allocated time, in accordance with the tariffs in the aforementioned Government Gazette.

The access fee is payable prior to being permitted access to the records in the required form. Access to records will therefore be withheld until all applicable fees have been paid.

15. Access Forms: See attached Addendum A, B, C, D

In respect of hard copies, any costs will be for the account of the requester. All costs are to be paid in full before the school can proceed with the request.

Mrs W. Lourens
COLLEGE HEADMISTRESS/IO

Mrs J. Sparrow
PREPARATORY SCHOOL HEADMISTRESS



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AIDS HELPLINE: 0800-123-22 Prevention is the cure

**SOUTHCITY CHRISTIAN SCHOOLS
PROTECTION OF PERSONAL INFORMATION POLICY**

**ANNEXURE A: PERSONAL INFORMATION REQUEST
FORM**

Please submit the completed form to the Information Officer below:

Name	Mrs J. Sparrow	or	Mrs W. Lourens
Email address	prephead@southcity.org.za	or	collegehead@southcity.org.za

Please be aware that we may require you to provide proof of identification prior to processing your request. There is a R50 base charge and 50c per page of copy for providing copies of the information requested.

Particulars of person requesting access to a record

Name and Surname	
Identity Number	
Mobile number	
Email address	
Postal address	
Years associated with SCS	
Capacity in which request is made if made on behalf of another person	
Particulars of person on whose behalf the request is made	
This section must be completed ONLY if a request for information is made on behalf of another person	
Name and Surname	
Identity number	

Nature of Request

I request SOUTHCITY CHRISTIAN PREPARATORY/COLLEGE to:

Provide me with a record or description of my personal information (state the nature of the information required and the reason for the request)

Signature (Person Requesting)	Date
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**SOUTHCITY CHRISTIAN SCHOOLS
PROTECTION OF PERSONAL INFORMATION POLICY**

ANNEXURE B: WITHDRAWAL OF CONSENT FORM

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act No.4 of 2013.
Please submit the completed form to the Information Officer below:

Name	Mrs J. Sparrow	or	Mrs W. Lourens
Email address	prephead@southcity.org.za	or	collegehead@southcity.org.za

Where we are unable to resolve your request to your satisfaction you have the right to complain to the Information Regulator who can be contacted at <http://www.justice.gov.za/inforeg/index.html>

Particulars of Person wishing to withdraw consent	
Name and Surname	
Identity Number	
Mobile number	
Email address	
Postal Address	
Signature:	Date:

Details of withdrawal of consent

Outcome – to be completed by the Head of School

Signature of Head	Date

**SOUTHCITY CHRISTIAN SCHOOLS
PROTECTION OF PERSONAL INFORMATION POLICY**

**ANNEXURE C: COMPLAINT CONCERNING THE PROCESSING OF
PERSONAL INFORMATION**

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act No.4 of 2013.
Please submit the completed form to the Information Officer below:

Name	Mrs J. Sparrow	or	Mrs W. Lourens
Email address	prephead@southcity.org.za	or	collegehead@southcity.org.za

Where we are unable to resolve your request to your satisfaction you have the right to complain to the Information Regulator who can be contacted at <http://www.justice.gov.za/infoereg/index.html>

Particulars of Complainant

Name and Surname			
Identity Number			
Mobile number			
Email address			
Postal Address			
Signature:		Date:	

Details of complaint

Outcome – to be completed by the Head of School

Signature of Head		Date	

**SOUTHCITY CHRISTIAN SCHOOLS
PROTECTION OF PERSONAL INFORMATION POLICY**

**ANNEXURE D: CHANGE OR UPDATE OF PERSONAL
INFORMATION/CREDENTIALS**

Child's Name : _____ Grade : _____

Please complete **ONLY** the details to be changed :

Mother: Name, cell phone number or email address	
Father: Name, cell phone number or email address	
Guardian: Name, cell phone number or email address	
Postal / Residential Address	
Financial (e.g. banking details for debit order, Account Holder, etc.)	
Other	

Please forward to the relevant school secretary.

NAME OF PARENT/GUARDIAN : _____ Date: _____

SIGNATURE: _____