

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



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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 G Pieterse	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/inforeg/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 Form 2 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

	<ul style="list-style-type: none"> ■ 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 ■ 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
Pupils	<ul style="list-style-type: none"> ■ Application for admission ■ Waiting list for admission ■ 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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
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
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. Form 2 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 Form 2 & 3

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
HEADMISTRESS



Mrs G. Pieterse
PREPARATORY SCHOOL

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION

Full Names			
Identity Number			
Capacity in which request made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	

Reference number, if available	
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Any further particulars of record	

TYPE OF RECORD
(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS
(Mark the applicable box with an "X")

Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

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4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive To be provided by requestor	R40.00		
(ii) Compact disc If provided by requestor	R40.00		
If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive • To be provided by requestor	R40.00		
(ii) Compact disc • If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes No

Hours of search		Amount of deposit <i>(calculated on one third of total amount per request)</i>	

The amount must be paid into the following Bank account:

Name of Bank: _____
Name of account holder: _____
Type of account: _____
Account number: _____
Branch Code: _____
Reference Nr: _____
Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____