



# **PAIA Manual**

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

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## Acronyms

IEB	Independent Examinations Board
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act No.4 of 2013

## **1 The Purpose of this PAIA Manual**

This PAIA Manual provides information to the public to facilitate the access to information records held by the Hatfield Christian Online School (referred to in this manual as the “Online School”). The Manual provides the following:

- The process to be followed to request access to information records held by the Online School, in accordance with PAIA;
- The categories of information records held by the Online School that are available for access without a person having to submit a formal PAIA request;
- The topics on which the Online School holds information records, and the categories of records held on each topic;
- The topics of information records held by the Online School that are available in accordance with other legislation;
- Descriptions of the personal information the Online School will process, and the purpose of processing such information;
- The data subjects or categories of data subjects of the Online School, and the personal information or categories of personal information that are held relating to these data subjects;
- The recipients or categories of recipients to whom personal information may be supplied;
- A description of the personal information the Online School may transfer or process outside the Republic of South Africa, the circumstances under which such transfer or processing would take place, and the recipients or categories of recipients to whom such personal information may be supplied;
- A summary description of the security measures the Online School has put in place to ensure the confidentiality, integrity and availability of the personal information that is processed;
- The relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the information records they wish to access; and
- A description of a Guide on how to use PAIA, published by the Information Regulator, and how to obtain a copy of it.

## **2 Information Records held by the Online School**

The information records held by the Online School are set out in Annexures A to C, as follows.

### **2.1 Information Records that are Available without a Specific Request**

The categories of information records set out in Annexure A are available without the need for a specific request. Copies of these records are available on the website of the Online School at [www.onlineschool.co.za](http://www.onlineschool.co.za) or from the head office of the Online School.

### **2.2 Information Records Available in accordance with other Legislation**

The categories of records set out in Annexure B are available in terms of other legislation.

### **2.3 Topics and Categories of Information Records Held**

The categories of information records set out in Annexure C are held by the Online School.

## **3 Processing of Personal Information**

### **3.1 Purpose of Processing Personal Information**

We collect and process personal information for various purposes, including:

- Services purposes – such as processing for and providing our educational services to school students;
- Marketing purposes – such as pursuing lawful related marketing activities;
- Business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- Legal purposes – such as handling claims, complying with legislation and regulations, concluding contracts and pursuing good governance.

For a more detailed description of the purposes for which we process personal information, see Annexure D.

To ensure that when we process personal information we do so lawfully, we may rely on one of several different provisions set out in POPIA, including the following:

- We may process personal information to carry out actions, such as those related to educating a student, for the performance of a contract, for example, to which a parent or guardian of a student is party.
- We may process personal information once we have secured the consent of the relevant person. In the case of personal information belonging to students below the age of 18 years, we would secure the consent of the parent or guardian.

### **3.2 Categories of Data Subjects and Related Information**

The types of personal information that we process for different categories of data subjects are set out in Annexure E.

### **3.3 Recipients to whom Personal Information may be Supplied**

The third parties to whom we may supply personal information are set out in Annexure F.

### **3.4 Planned Transfer of Personal Information Outside South Africa**

The personal information that we process on our Education Management Information System (EMIS), and on our Learning Management System (Moodle) ordinarily remains within the jurisdiction of South Africa on the servers which we use. However, personal information may be transferred outside South Africa when the parents or guardians of students, the students themselves, or teachers access the EMIS or Moodle from outside the borders of South Africa.

We use Google Workspace for email and related services, such as video conferencing and document storage. Personal information stored or transmitted by Google Workspace services may be transferred outside the borders of South Africa as their services are hosted internationally.

We also make use of Zoom for video conferencing, and this use can involve the transfer of personal information outside the borders of South Africa.

We note that these transfers of personal information outside South Africa, mentioned above, are necessary for the provision of the educational services that fulfil the core mission of the Online School.

### **3.5 Information Security Measures Implemented**

The following measures are being implemented to protect personal information held by the Online School:

- **Antivirus software** – Anti-virus / anti-malware software is implemented on desktop and laptop computers that access the Online School's systems and network.
- **Password control** – Password controls are implemented to ensure the use of strong passwords.
- **Firewall** – Advanced firewall technology is used to protect the Online School network from unauthorised access from the Internet.
- **Software patches** – Application and system software is regularly updated with security patches.
- **Backups** – Backups of data are made on a regular basis and kept offline in a secure location.
- **Staff training** – Staff are trained on implementing information security policies and procedures.

#### **4 The Information Regulator's Guide to PAIA**

The Information Regulator has, in terms of section 10(1) of PAIA as amended, made available a Guide on how to use PAIA. It is intended for use by anyone who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille.

The Guide contains descriptions of:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of:
  - the Information Officer of every public body, and
  - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for:
  - access to a record of a public body contemplated in section 11; and
  - access to a record of a private body contemplated in section 50;
- the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- the assistance available from the Information Regulator in terms of PAIA and POPIA;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
  - an internal appeal;
  - a complaint to the Information Regulator; and
  - an application to a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Information Regulator or a decision of the head of a private body;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.

The Guide can also be obtained:

- from the Online School website ([www.onlineschool.co.za](http://www.onlineschool.co.za));
- from the website of the Information Regulator ([www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)).

## 5 The Online School PAIA Manual

### 5.1 Availability of the Online School PAIA Manual

A copy of the Online School PAIA Manual is available:

- on the Online School website ([www.onlineschool.co.za](http://www.onlineschool.co.za));
- at the offices of the Online School, in Waterkloof Glen, Pretoria, for public inspection during normal business hours;
- to any person upon request and upon the payment of the prescribed fee; and
- to the Information Regulator upon request.

A fee for a copy of the Online School PAIA Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

### 5.2 Updating the Online School PAIA Manual

The Information Officer of the Online School will update this manual on a regular basis.

## 6 Requesting Access to Information Records

### 6.1 Procedure to Follow

The procedure to follow to request access to an information record of the Online School is set out in the Information Regulator's *Guide: How to use PAIA* (see section 4 above). The procedure is summarised on pages 55 and 56 of the Guide (section 25).

The first step of the procedure is to complete and then submit to the Online School the prescribed *Form 2: Request for Access to Record*. A copy of Form 2 is available on the Online School website ([www.onlineschool.co.za](http://www.onlineschool.co.za)).

### 6.2 Contact Details for the Online School

#### **Request for Access to an Information Record, and General:**

Email: [admin@onlineschool.co.za](mailto:admin@onlineschool.co.za)

#### **Information Officer**

Name: Mr Graeme Lynton Holloway

Tel: 012 361 1182

Email: [gholloway@hatfieldcs.co.za](mailto:gholloway@hatfieldcs.co.za)

#### **Deputy Information Officer**

Name: Mr Peter Harold Greenwood

Tel: 012 361 1182

Email: [pgreenwood@onlineschool.co.za](mailto:pgreenwood@onlineschool.co.za)

**Head Office**

Postal Address: 551 January Masilela Drive  
Waterkloof Glen  
Pretoria  
Gauteng  
0010

Physical Address: 551 January Masilela Drive  
Waterkloof Glen  
Pretoria

Telephone: 012 361 1182

Email: [admin@onlineschool.co.za](mailto:admin@onlineschool.co.za)

Website: [www.onlineschool.co.za](http://www.onlineschool.co.za)

Issued by

Graeme Lyndon Holloway

Executive Principal

## Annexure A: Information Records Available without a Specific Request

This table sets out the information records that may be accessed on the Online School website.

<b>Information available on the Online School website</b> www.onlineschool.co.za.
<ul style="list-style-type: none"><li>• The mission and objectives of the Online School</li><li>• Product, service and promotional information</li><li>• News and other marketing information</li><li>• Statement of Faith</li><li>• Privacy Policy</li><li>• PAIA Manual</li></ul>

## **Annexure B: Information Records Available in accordance with other Legislation**

This table indicates the legislation in accordance with which information records are held by the Online School.

<b>Information records are held as specified by the following legislation</b>
<b>A</b>
<b>B</b> Basic Conditions of Employment Act, 75 of 1997
<b>C</b> Companies Act, 71 of 2008 Compensation for Occupational Injuries Act, 130 of 1993 Competition Act, 89 of 1998 Constitution of South Africa, 108 of 1996 Consumer Protection Act, 68 of 2008 Copyright Act, 98 of 1987
<b>D</b> Debt Collectors Act, 114 of 1998
<b>E</b> Electronic Communications and Transactions Act, 25 of 2002 Employment Equity Act, 55 of 1998
<b>F</b> Financial Intelligence Centre Act, 38 of 2001 Firearms Control Act, 60 of 2000
<b>G</b>
<b>H</b>
<b>I</b> Income Tax Act, 58 of 1962 Insolvency Act, 24 of 1936
<b>J</b>
<b>K</b>
<b>L</b> Labour Relations Act, 66 of 1995

**Information records are held as specified by the following legislation**

**M**

**N**

National Credit Act, 34 of 2005

Non Profit Organisations Act, 71 of 1997

**O**

Occupational Health and Safety Act, No. 85 of 1993

**P**

Pension Funds Act, 24 of 1956

Promotion of Access to Information Act No. 2 of 2000 (as amended)

Protection of Personal Information Act No.4 of 2013

**Q**

**R**

Regulation of Interception of Communications and Provision of Communication Related Information Act, 70 of 2002

**S**

Short Term Insurance Act, 53 of 1998

Skills Development Act, 97 of 1998

Skills Development Levies Act, 9 of 1999

South African Revenue Service Act, 34 of 1997

Statistics Act, 6 of 1999

South African Schools Act, 84 of 1996

**T**

Tax on Retirement Funds Act, No 38 of 1996

Telecommunications Act, 103 of 1996;

**U**

Unemployment Insurance Act, 63 of 2001

**V**

Value Added Tax Act, 89 of 1991

**W**

**X**

**Y**

**Z**

## Annexure C: Topics and Categories of Information Records Held

This table sets out the categories of information records held for different topics of information.

Information Topic	Categories of Records
Corporate Affairs and Investor Relations / Communications	<ul style="list-style-type: none"> <li>• Media releases</li> <li>• Newsletters and publications</li> <li>• Corporate Social Investment</li> <li>• Public corporate records</li> </ul>
Corporate Secretariat and Governance	<ul style="list-style-type: none"> <li>• Applicable statutory documents</li> <li>• Annual reports</li> <li>• Board of directors and Board Committee Terms of Reference</li> <li>• Codes of Conduct</li> <li>• Executive committee meeting minutes</li> <li>• Legal compliance records</li> <li>• Memoranda of Incorporation</li> <li>• Minutes of Board of Directors and Board Committee meetings</li> <li>• Minutes of shareholders' meetings</li> <li>• Group policies and procedures</li> <li>• Share certificates</li> <li>• Shareholder agreements</li> <li>• Share registers</li> <li>• Strategic plans</li> <li>• Statutory returns to relevant authorities</li> </ul>
Administration	<ul style="list-style-type: none"> <li>• Governance structures and personal data of governance office-bearers</li> <li>• Internal rules, regulations and policies, minutes of meetings</li> <li>• Financial records</li> <li>• Contracts, partnerships, service providers, clients</li> <li>• Employment equity data</li> <li>• Statutory and other licenses</li> <li>• General correspondence (emails)</li> <li>• IEB Centre Number</li> <li>• IEB candidate registration</li> </ul>

Information Topic	Categories of Records
Human Resources	<ul style="list-style-type: none"> <li>• Education and training records</li> <li>• Employee benefit records</li> <li>• Employment contracts</li> <li>• Employment Equity records</li> <li>• Employee information</li> <li>• Policies and procedures</li> <li>• Group life information</li> <li>• Leave records</li> <li>• Medical records</li> <li>• Pension and retirement funding records</li> <li>• Study assistance schemes</li> <li>• Tax certificates of employees</li> <li>• UIF Returns</li> <li>• Advertised posts</li> <li>• Health and safety regulations</li> <li>• Performance appraisals</li> <li>• Remuneration records</li> <li>• Staff recruitment policies</li> </ul>
Finance and taxation	<ul style="list-style-type: none"> <li>• Policies and procedures</li> <li>• Accounting records</li> <li>• Annual financial statements</li> <li>• Audit reports</li> <li>• Capital expenditure records</li> <li>• Investment Records</li> <li>• Invoices and statements</li> <li>• Management reports</li> <li>• Purchasing records</li> <li>• Sale and supply records</li> <li>• Tax records and returns</li> <li>• Transactional records</li> <li>• Asset Register</li> <li>• Budgets</li> <li>• Insurance information</li> <li>• Expense claims</li> </ul>
Operations	<ul style="list-style-type: none"> <li>• Information records concerning students and their parents (see Annexure E)</li> <li>• Information records concerning service providers (see Annexure E)</li> <li>• Contracts, and Terms and Conditions</li> <li>• Student assessments</li> </ul>

Information Topic	Categories of Records
Information Technology	<ul style="list-style-type: none"> <li>• Contracts</li> <li>• Disaster recovery plans</li> <li>• Policies and procedures</li> <li>• Licenses</li> <li>• Network diagrams</li> <li>• Manuals</li> </ul>
Intellectual Property	<ul style="list-style-type: none"> <li>• Trademark applications</li> <li>• Agreements relating to intellectual property</li> <li>• Copyright information</li> </ul>
Legal	<ul style="list-style-type: none"> <li>• Complaints, pleadings, briefs and other documents pertaining to any actual or pending litigation, arbitration or investigation</li> <li>• Material licenses, permits and authorisations</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>• Third-party rights</li> </ul>
Sales, marketing and communication	<ul style="list-style-type: none"> <li>• Brochures, newsletters and advertising material</li> <li>• Client information</li> <li>• Marketing brochures</li> <li>• Marketing strategies</li> <li>• Product brochures</li> <li>• Policies and procedures</li> </ul>
Academic records	<ul style="list-style-type: none"> <li>• Records of students</li> <li>• Curriculum and programme material and accreditations</li> <li>• IEB and Umalusi records</li> <li>• Teaching and learning materials</li> </ul>

## Annexure D: Purposes for Processing Personal Information

This table describes in more detail the purposes for the Online School processing personal information.

<b>Purposes for Processing Personal Information</b>
<ul style="list-style-type: none"><li>• Fulfilling the statutory obligations of the Online School in terms of applicable legislation;</li><li>• Verifying information provided to the Online School;</li><li>• Obtaining information necessary to provide contractually agreed services to clients, parents and students;</li><li>• Monitoring, maintaining and managing contractual obligations to clients, suppliers, service providers, employees, parents, students, directors, donors and other third parties;</li><li>• Marketing and advertising;</li><li>• Resolving and tracking complaints;</li><li>• Monitoring and securing the assets, employees and visitors to the premises of the Online School through recordings and video footage;</li><li>• Historical record keeping, research and recording statistics necessary for fulfilling business objectives.</li></ul>

## Annexure E: Categories of Data Subjects and Related Personal Information

This table sets out the types of personal information that we process for different kinds of data subjects.

Data Subjects	Types of Personal Information
Students and their parents	<ul style="list-style-type: none"> <li>• Identifying information – such as name, date of birth, identification number of any kind, biometric information, or online identifier</li> <li>• Contact information – such as phone number or email address</li> <li>• Address information – such as physical or postal address</li> <li>• Demographic information – such as gender or marital status</li> <li>• Financial information – such as bank account details</li> <li>• Sensitive demographic information – such as race or ethnicity</li> <li>• Other sensitive information – such as religion and belief</li> <li>• Medical information – such as information about physical or mental health</li> <li>• Employment information – including current employer</li> <li>• Academic records</li> </ul>
Schools, and their staff, that make use of our educational services	<ul style="list-style-type: none"> <li>• Identifying information – such as registration number</li> <li>• Contact information – such as phone number and email address;</li> <li>• Address information – such as physical or postal address;</li> <li>• Demographic information – such as gender or marital status.</li> </ul>

Data Subjects	Types of Personal Information
Employees	<ul style="list-style-type: none"> <li>• Identifying information – such as name, date of birth, identification number of any kind</li> <li>• Contact information – such as phone number or email address</li> <li>• Address information – such as physical or postal address</li> <li>• Demographic information – such as gender or marital status</li> <li>• Educational information – such as educational qualifications</li> <li>• Financial information – such as bank account details</li> <li>• Sensitive demographic information – such as race, ethnicity, national origin, age, date of birth, disability, language, religion or belief</li> <li>• Other sensitive information – such as opinions, views or preferences, the views or opinions of another individual about the employee, or confidential correspondence with the employee</li> <li>• Employment information – including previous and current employers</li> <li>• Criminal history – such as previous convictions</li> </ul>
Service providers	<ul style="list-style-type: none"> <li>• Identifying information – such as registration number</li> <li>• Contact information – such as address, email address and phone numbers</li> <li>• Financial information – such as bank details, tax and VAT numbers</li> <li>• Contract data</li> <li>• Organisation data</li> <li>• Confidential correspondence</li> </ul>

## Annexure F: Recipients to whom Personal Information may be Supplied

This table sets out the types of personal information that we may supply to certain third parties.

<b>Recipients</b>	<b>Types of Personal Information</b>
South African Police Services	Name and identity number – for criminal check, or report of alleged criminal activity
South African Qualifications Authority	Qualifications – for qualification verification
Credit Bureaux	Credit and payment history – for credit check
Independent Examinations Board	Student information – for registering students and publishing examination results

**Annexure G: Form 2: Request for Access to Record**

# 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 is made <i>(when made on behalf of another person)</i>	
Postal Address	
Street Address	
E-mail Address	
Contact Numbers	Tel. (B): <input style="width: 150px;" type="text"/> Facsimile: <input style="width: 100px;" type="text"/>
	Cellular: <input style="width: 400px;" type="text"/>
Full names of person on whose behalf request is made <i>(if applicable):</i>	
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	
--------------------------------	--

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	

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <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 record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record 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>	
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>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
<i>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.</i>	
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:	

<b>FEES</b>	
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**

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

\_\_\_\_\_  
**Signature of Information Officer**