



St Andrew's School
— **for Girls** —
SKILLED FOR LIFE

PROMOTION OF ACCESS TO INFORMATION MANUAL

FOR

ST ANDREW'S SCHOOL FOR GIRLS NPC

Reg no: 1923/007507/08

**PREPARED IN TERMS OF SECTION 51 OF THE
PROMOTION OF ACCESS INFORMATION ACT, ACT 2 OF 2000 (AS
AMENDED)
"PAIA"**

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INTRODUCTION TO ST ANDREW'S SCHOOL FOR GIRLS (NPC)

St Andrew's School for Girls (NPC) is a non-profit company incorporated under the Companies Act, 2008 (1923/007507/08). It is an independent school for girls registered as such with the Gauteng Department of Education. It provides pre-primary, primary and secondary education and enrolls students between PR1 and Grade 12. It is a private body for the purposes of both PAIA and POPIA. It is referred to in what follows as "the School".

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1.	“EXEC”	Executive head
1.2.	“DIO”	Deputy Information Officer
1.3.	“Guardian”	Legal Guardian of student
1.4.	“IO”	Information Officer
1.5.	“Minister”	Minister of Justice and Correctional Services
1.6.	“NPC”	Non-profit Company
1.7.	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
1.8.	“Parent”	Parent of student
1.9.	“POPIA”	Protection of Personal Information Act No.4 of 2013
1.10.	“Regulator”	Information Regulator
1.11.	“Republic”	Republic of South Africa
1.12.	“The School”	St Andrew’s school for Girls

2. PURPOSE OF PAIA MANUAL

2.1. This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by a School which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the School, by providing a description of the subjects on which the School holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the School which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the School will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the School has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the School has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF ST ANDREW'S SCHOOL FOR GIRLS (NPC)

3.1 Executive Head

Name: Gillian Jeffrey
Tel: +27 11 453 9408
Email: head@standrews.co.za

3.2 Deputy Information Officer.

Name: Lynn Murray
Tel: +27 11 453 9408
Email: lmurray@standrews.co.za

3.3 Access to information general contacts

Email: head@standrews.co.za

3.4 Contact Information

Postal Address: Private Bag X79001, Senderwood, 2145
Physical Address: St Andrew's Ave, Senderwood, 2008
Telephone: +27 11 453 9408
Email: head@standrews.co.za
Website: www.standrews.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of:
- 4.3.1 the objects of PAIA and POPIA;
 - 4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of:
 - 4.3.2.1 the Information Officer of every public body, and
 - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3 the manner and form of a request for:
 - 4.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50⁴;
 - 4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6 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:
 - 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and
 - 4.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

that record is required for the exercise or protection of any rights;

that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part

- 4.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92¹¹.

4.4 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 Regulator, during normal working hours.

4.5 The Guide can also be obtained-

- 4.5.1 upon request to the Information Officer;
- 4.5.2 from the website of the Regulator <https://infoeregulator.org.za/training/wp/paia-guidelines/>

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

- 4.6.1 English and isiZulu

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-
any matter which is required or permitted by this Act to be prescribed;

any matter relating to the fees contemplated in sections 22 and 54;

any notice required by this Act;

uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

any administrative or procedural matter necessary to give effect to the provisions of this Act.”

5. CATEGORIES OF RECORDS OF ST ANDREW'S SCHOOL FOR GIRLS (NPC) WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

- 5.1. All information pertaining to the School on its website at www.standrews.co.za is available for inspection and does not need to be requested in terms of the Act.
- 5.2. Records which are available upon request for inspection by appointment during normal school hours at the registered office of the school (located at its principal place of business set out in section 3 of this manual), in accordance with the Companies Act, 2008 include:
 - 5.2.1.1. Memorandum of Incorporation;
 - 5.2.1.2. Register of directors and officers;
- 5.3. The following documents of the company are lodged with the Companies and Intellectual Property Commission:
 - 5.3.1. Memorandum of incorporation and articles of association
 - 5.3.2. Return of directors and officers
 - 5.3.3. Other statutory documents
- 5.4. Copies are available on request in accordance with the provisions of the Companies Act and on payment of the prescribed fee.

6. DESCRIPTION OF THE RECORDS OF ST ANDREW'S SCHOOL FOR GIRLS (NPC) WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

The legislation listed may create rights and procedures in terms of which records kept may be obtained by a requester. Where applicable and insofar as the requester complies with the requirements of the relevant act, and subject to the provisions of PAIA and POPIA, the requester may request access to such records.

Category of Records	Applicable Legislation
Employee	Basic Conditions of Employment No. 75 of 1997
	Compensation for Occupational Injuries and Health
	Diseases Act No.130 of 1993
	Employment Equity Act 55 of 1998
	Labour Relations Act 66 of 1995
	Occupational Health and Safety Act 85 of 1993
	Pensions Fund Act 24 of 1956
	Regional Services Council Act 109 of 1985
	Skills Development Act No. 97 of 1998
	Skills Development Levies Act No. 9 of 1999
	Unemployment Contributions Act No. 4 of 2002
	Unemployment Insurance Act No. 63 of 2001
Memorandum of incorporation	Companies Act No. 71 of 2008
	Companies Amendment Act No 3 of 2011
SARS	Income Tax Act No. 95 of 1967
	Tax Administration Act, 2011
	Value-Added Tax Act, 1991
South African schools	National Norms and Standards For School Funding were published in Government Notice No.890, Government Gazette No. 29179 of 31 August 2006
PAIA Manual	Promotion of Access of Information Act No 2 of 2000
Students	Children's Act, No 38 of 2005
Department of Education	School Education Act, 1999

	South African Schools Act 84 of 1996
Employer	Debtors Collectors Act of 1998
	Electronic Communications and Transactions Act 25 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY ST ANDREW'S SCHOOL FOR GIRLS (NPC)

The School holds records in the following categories and subject matters. All records described are held for one or more of the purposes described in Section 8 of this manual. Please note that recording a category or subject matter in this manual does not imply that a request for access to such records will be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA and POPIA.

Subjects on which the body holds records	Categories of records
Administration	<ul style="list-style-type: none"> Health and Safety Minutes of Meetings of various governance and management structures of the school, including the Board, Finance Committee and other executive committees Registration documents and confirmation of ISASA, IEB and Umalusi registrations School Policies and Procedures Statutory Returns and Records
Strategic Documents, Plans, Proposals	Strategic Plan
Human Resources	<ul style="list-style-type: none"> Human Resources policies and procedures Advertised posts Employees records including SACE registration Records relating to statutory deductions and contributions
Finance	<ul style="list-style-type: none"> Annual Financial Statements Asset Register Accounting records including banking records Purchasing and expenditure records Receipt records Debtors and creditors records Management accounts Budgets

	<p>Supplier Contracts</p> <p>General Correspondence</p> <p>Insurance Information</p> <p>Tax Records</p>
Students	<p>Student attendance register</p> <p>Returns and reports to the Gauteng Department of Education</p> <p>Academic and performance and conduct records</p>
Parents	<p>Contracts relating to the admission and enrolment of their child</p>
Prospective students and parents	<p>Reference and credit checks</p>

8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information

8.1.1. St Andrew's shall:-

- 8.1.1.1. only collect personal information for specific, explicitly defined and lawful purposes relating to its functional activity and shall, unless it is legitimately justified not to, ensure that the data subject is aware of the purpose for collection and processing;
- 8.1.1.2. not retain personal information any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed, unless required to do so by law, or it is reasonably required for lawful purposes related to St Andrew's functions or activities, or where retention is required by a contract concluded between St Andrew's and the data subject, or the data subject has consented to the retention of his or her personal information.
- 8.1.1.3. process personal information lawfully and in a reasonable manner that does not infringe the privacy of a data subject;
- 8.1.1.4. process personal information limited to the purpose for which it is to be processed, its adequacy, relevance and ensure that the information collected is not excessive;
- 8.1.1.5. only process personal information where it has the consent of the data subject (person to whom the personal information belongs), alternatively legitimate justification for processing the information;
- 8.1.1.6. collect personal information directly from a data subject, unless it has a legitimate justification for collecting the information from another source.

8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto Categories of data subjects

The categories of data subjects include:

Categories of Data Subjects	Personal Information that may be processed
Employees/Prospective employees	Personal information and special personal information Payroll and human resources records Address, qualification, gender and race
Parents/Guardians current, past and prospective	Personal information and special personal information Contracts relating to the admission and enrolment of their child including references and credit agency checks
Students current, past and prospective	Personal information and special personal information Student attendance registers Returns and reports to the Gauteng Education Department Academic, performance and conduct records
Service providers, vendors / other business	Company names Addresses Registration numbers Banking details

8.3. 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	South African Police Services
Qualifications for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4. Planned transborder flows of personal information

8.4.1. The following is categories of information is stored outside the borders of South Africa:

8.4.1.1. School management system (Ed-Admin)

8.4.1.2. Email and cloud storage (Microsoft 365)

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

8.5.1. The School takes reasonable, appropriate, technical, and organisational measures to protect personal information from loss, damage, unauthorised access, processing, destruction or manipulation.

8.5.2. The school has implemented the following security measures:

8.5.2.1. The school's information officer whose details are set out in this manual is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPIA.

8.5.2.2. The information officer is assisted by a deputy information officer.

8.5.2.3. This policy has been put in place and training of the responsible managers and all employees on this policy and on the school's Protection of Personal Information Policy under POPIA takes place.

8.5.2.4. Each new employee is required to sign an employment contract containing relevant consent clauses for the processing of the employee's personal information, or any other action so required, in terms of POPIA and a confidentiality clause.

8.5.2.5. The school's service providers are required to sign an addendum to the relevant Service Level Agreement guaranteeing their commitment to the protection of personal information.

- 8.5.2.6. The school's information officer and the IT department identify all reasonably foreseeable internal and external risks to personal information and have established and will maintain appropriate safeguards against the risks identified. They regularly verify that the safeguards are effectively implemented and will ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.
- 8.5.2.7. Data subjects will be informed should their personal information be accessed or acquired by any unauthorised person.

9. AVAILABILITY OF THIS MANUAL

This manual has been compiled by the school in terms of section 51 of PAIA.

9.1 A copy of the Manual is available-

- 9.1.1 on www.standrews.co.za
- 9.1.2 Head office of the St Andrew's school for girls for public inspection during normal business hours;
- 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 9.1.4 to the Information Regulator upon request.

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

10. UPDATING OF THE MANUAL

The Deputy Information Office at St Andrew's School for Girls will on a regular basis update this manual.

Issued by

Lynn Murray

ICT Co-ordinator and Deputy Information Officer

Annexure A
FORM C
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Executive Head:

B. Particulars of person requesting access to the record

- | |
|---|
| (a) The particulars of the person who requests access to the record must be given below. |
| (b) The address and/or fax number in the Republic to which the information is to be sent must be given. |

Full names and surname: _____

Identity number:

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Postal address: _____

Telephone number: (.....)

Fax number: (.....)

E-mail address: _____

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity number:

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

D. Particulars of record

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid
- (b) You will be notified of the amount required to be paid as the request fee
- (c) 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
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an X .	
NOTES:	
(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images – (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
--	-----	----

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form.

The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

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

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ - _____ this day _____ of _____ year _____

SIGNATURE OF REQUESTER
/PERSON ON WHOSE BEHALF
REQUEST IS MADE

PAYMENT OF FEES

Item	Description	Amount
1.	The "request fee" payable by every requester	R100.00

The "access fees" referred to in section 22(6) of the Act (unless the requester is exempted under section 22(8)) are as follows:

Item	Description	Amount
2.	Photocopy of A4-size page	R1.50 per page or part thereof
3.	Printed copy of A4-size page	R1.50 per page or part thereof
4.	For a copy in a computer-readable form on: Flash drive (to be provided by requester) Compact disc If provided by requester If provided to the requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size	R24.00
8.	For a copy of an audio record on: Flash drive (to be provided by requester) (iv) Compact disc If provided by requester If provided to the requester	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R100.00
	To not exceed a total cost of	R300.00
10	Deposit: If search exceeds 6 hours	One-third of amount per request, calculated in terms of items 2 to 8
11.	Postage, email or any other electronic transfer	Actual expense, if any

PERSON OR PERSONS EXEMPTED FROM PAYING ACCESS FEES	
A single person whose annual income does not exceed	R14,712.00
Married persons or a person and his/her life partner whose annual income does not exceed	R27,192.00