



PAIA MANUAL

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

This manual applies to
ST MARTIN'S PRE-PRIMARY SCHOOL

1 October 2021

Registered office address:
12 Chelsea Drive, Durban North, 4051, Kwa-Zulu Natal, South Africa

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1. LIST OF ACRONYMS AND ABBREVIATIONS

CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	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
Republic	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body 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 body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body 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 body 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 body 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 body 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 THE

Chief Information Officer	Name: Miss Barbara Daniel Telephone: + 27 31 564 6555 Email: bdaniel@stmartinspreprimary.co.za
Deputy Information Officers	Name: Mrs Belinda Fincham Telephone: + 27 31 564 6555 Email: bursar@martinspreprimary.co.za Name: Mrs Tracey Roothman Telephone: Email: admin@martinspreprimary.co.za
School Contact Details	Postal Address: 12 Chelsea Drive, Durban North, 4051. KwaZulu-Natal. South Africa Physical Address: 12 Chelsea Drive, Durban North, 4051. KwaZulu-Natal. South Africa Telephone: + 27 31 564 6555 Email: admin@martinspreprimary.co.za Website: www@martinspreprimary.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;

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.*

- 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;
- 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;

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-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

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

- 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://www.justice.gov.za/infoereg/>).
- 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
- 4.6.2 IsiZulu

5. CATEGORIES OF RECORDS OF ST BENEDICT SCHOOL WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The School's address, contact numbers and the School's history are all available on the School's website. These may be downloaded off the website and do not require permission from the School. (www.stbenedictschool.co.za)

Category of Records	Types of Records	Available on Website	Available upon request
School Address	Electronic	Yes	Yes
School Contact Numbers	Electronic	Yes	Yes
History of the School	Electronic	Yes	Yes
School Fees	Electronic	Yes	Yes
Operating Hours	Electronic	Yes	Yes
Termly Dates	Electronic	Yes	Yes
Photographic Gallery	Electronic	Yes	No
Application Process	Electronic	Yes	Yes

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-

(a) any matter which is required or permitted by this Act to be prescribed;

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

(c) any notice required by this Act;

(d) 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

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

6. DESCRIPTION OF THE RECORDS OF ST MARTIN'S PRE-PRIMARY SCHOOL WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
In Universitas Association	South African Schools' Act 108 of 1996
Financial Statements	South African Non-Profit Organisations' Act 71 of 1997
PAIA Manual	Promotion of Access to Information Act 2 of 2000
COVID-19 Protocols	Most recent applicable Government Gazette

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY ST MARTIN'S PRE-PRIMARY SCHOOL.

Subjects on which the body holds records	Categories of Records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	- HR policies and Procedures - Advertised Posts - Employees' Records
Finance	- Contracts for External Contractors - Details of Employees' Salary Scales, UIF and PAYE Contributions and Leave Records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

In order for the St Martin's Pre-Primary School to function, Personal Information of Staff, Parents, Students has to be kept.

For legal, Billing and Administrative purposes, the contact details of parents is kept in a locked filing cabinet in the Bursar's Office.

Student Information: name, date of birth, address, contact numbers, allergies is also stored in a locked cabinet in the Bursar's Office. Along with the academic transcript of all students.

8.2 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
Parents	Name, address, identity numbers, contact details and bank details
Service Providers	Name of business and contact persons, registration number, vat numbers, address, bank details
Employees	address, contact details, identity number, employment status and history, qualifications, gender and race, next of kin details, banking details, SARS details, Provident fund info, PAYE, UIF, leave records, medical details, emergency contact details
Students	Personal information and details, name, address, identity numbers, academic transcripts

St Martin's Pre-Primary School processes personal information for the following specific, explicitly define and lawful reasons:

- To initiate recruitment and the management of employees
- To comply with relevant legislation governing employees
- To finalise pupil enrolment
- To manage pupil profiles and academic progress including examination and assessment
- To monitor account payment of pupils
- To engage with parents / guardians
- To engage with contractors and service providers
- To support marketing activities

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, SACE
Credit and payment history, for credit information	Credit Bureaus
Financial statement of accounts, name, address, identity numbers, contact details	Legal services or debt collection services
Identity number, names, age, gender, admission date, academic subjects , academic record of students	Microsoft Access Data Handling Programme, Department of Basic Education and local schools

Category of Personal Information	Recipients or Categories of Recipients to whom the personal information may be supplied
Address, contact details, employment status, qualifications, gender and race, next of kin details banking details, SARS details, provident fund info	BDO Spenser Stewart and HDI Group dealing with salary and/or provident fund matters
Photographs of Students	Photography Company
Photocopying Machines	Photocopying Company
Information Technology	IT Company

There are some planned recipients who may ask for personal information. Namely:

- Statutory authorities
- Law enforcement
- Tax authorities
- Financial institutions
- Medical schemes
- Employee pension and provident funds

8.4 Planned trans-border flows of personal information

No information is stored in the cloud outside the Republic of South Africa. Only on the confirmation by the parent, is any information planned trans-border.

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

St Martin's Pre-Primary School ensures to the best of their ability, the confidentiality and integrity of the personal information under the care of the School. Anti – virus and Anti – malware products are in place. All hard copy documents that contain personal information, are safely stored in locked filing cabinets in the Bursar's Office or in the school strong room / safe. The school continues to upgrade and manage the information in their possession to comply with the POPI Act.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.stmartinspreprimary.co.za,

9.1.2 at the Office of St Martin's Pre-Primary School 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.

9.2 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 Principal of St Martin's Pre-Primary School will on a regular basis update this manual.

Issued by: Miss Barbara Daniel
Principal