



Kleuterskool Kwaggasrand

PAIA and POPIA Manual

This Manual has been prepared in terms of Section 51 of the Promotion Of Access to Information Act 2 of 2002 and the Protection of Personal Information Act, 2013

This manual applies to:

Kleuterskool Kwaggasrand
Registration number: 2011/043313/23
(hereinafter referred to as Kwaggasrand Kleuterskool/Nursery School)

Table of Contents

Acronyms and Abbreviations	2
Background.....	2
Aims and Intent	2
Company Information	3
Publication and Availability of Certain Records – Chapter 2, Section 51.....	3
Contact Details of the Business Owner – Section 51(1)(a).....	3
Contact Details of the Information Officer – Section 51(1)(b)	3
Information, Records and Documents Available In Accordance With Other Legislation – Section 51(1)(d)	3
Access to Records Only on Request - Section 51(1)(e).....	5
Records Available without a Request in terms of the Act.....	5
Categories and Documents and Information Held By Kleuterskool Kwaggasrand.....	5
Process to Request Access to a Record.....	8
Refusal of Access to Records.....	8
Remedies Available When Kleuterskool Kwaggasrand Refuses Access to Records.....	9
Prescribed Fees	9
Fee Schedule	9
Protection of Personal Information that is Processed by Kleuterskool Kwaggasrand	10
Personal Information of a Data Subject.....	10
Purpose of the Processing of Personal Information and Special Personal Information	11
Categories of Data Subjects and Personal Information and Special Personal Information	12
Recipients of Personal Information.....	13
Cross border transfers of Personal Information.....	13
Objection to the Processing of Personal Information by a Data Subject	13
Request for Correction or Deletion of Personal Information	13

Availability Of This PAIA Manual - Section 51(3)	14
Contact Details of the South African Human Rights Commission	14
Annexure A – Form C for the Objection to the Processing of Personal Information.....	15
Annexure B – Form 1 for the Objection to the Processing of Personal Information.....	19
Annexure C – Form 2 Request for Correction or Deletion of Personal Information	21

Acronyms and Abbreviations

- " The Act " - the Promotion of Access to Information Act, Act No. 2 of 2000.
- "The Constitution" – the Constitution of the Republic of South Africa
- "Company" - Kleuterskool Kwaggasrand., structured as a Close Corporation Organisation which provides childcare and education services.
- " SAHRC " - the South African Human Rights Commission
- "Information Officer" or "IO" - The Information Officer appointed at your organisation.
- "Information Regulator" or "IR - The official Information Regulator appointed by Government.
- "Third party" – In this manual third parties also refers to Data Subjects.
- "Data Subject" – any natural or juristic person that you keep Personal Information or Special Personal Information.
- "Personal Information" or "PI" – Information held on natural and juristic people.
- "Special Personal Information" or "SPI" – Information held on natural and juristic people with additional processing rules.

Background

1. The Promotion of Access to Information Act, No. 2 of 2000 (the "Act") was enacted on 3 February 2000, giving effect to our constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (the "Constitution") to access to any information held by the state and any information or another body.
2. In terms of section 51 of the Act we are required to compile an Information Manual ("PAIA Manual").
3. Where a request is made in terms of the Act, we are obliged to release the information, subject to applicable legislative and/or regulatory requirements.
4. This PAIA Manual complies with the requirements mentioned in section 10 of the Act and recognises that in terms of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act.
5. "Staff" refers to any person who:
 - a. Conducts or carries out business on our behalf,
 - b. Works for or provides services to us, or on our behalf.
 - c. Receives or is entitled to receive remuneration from us.
 - d. This includes:
 - i. All forms of directors.
 - ii. All permanent, temporary, and part-time staff as well as contract workers.
6. The manual may be amended from time to time, when any amendments have been finalised, the latest version of this manual will be made public.

Aims and Intent.

1. The aim of this manual is to assist potential requestors and explain the procedure to be followed when requesting access to information / documents from Kleuterskool Kwaggasrand as contemplated in terms of the PAIA.

2. The intent of this PAIA Manual is to promote the right of access to information and to foster a culture of transparency and accountability within Kleuterskool Kwaggasrand by giving people the right of access to information so that they may exercise their rights and also the right to protection of information.

Company Information

1. Kleuterskool Kwaggasrand provides quality, full day early learning and care for children aged 15 months to 6 years at our partial care premises. Our services are tailored to provide for the children and their family's needs in line with the community we operate in.
2. We work in our immediate community of Kwaggasrand and provide services to people in need.

Publication and Availability of Certain Records – Chapter 2, Section 51

Contact Details of the Business Owner – Section 51(1)(a)

Ingrid Strydom
181 Rod Street
Kwaggasrand

0183

Telephone number: 012 386 6597
Email address: Ingrid.Strydom@pilog.co.za
Website: www.kwaggasrandnurseryschool.co.za

Contact Details of the Information Officer – Section 51(1)(b)

1. Kleuterskool Kwaggasrand has appointed an Information Officer to assess requests for information as well as to oversee the required provisions in terms of the Protection of Personal Information Act 4 of 2013 and the Promotion of Access to Information Act 2 of 2002.
2. Requests for information must be submitted in writing to the Information Officer at:

Ingrid Strydom
181 Rod Street Kwaggasrand 0183
Telephone number: 012 386 6597
Email address: Ingrid.Strydom@Pilog.co.za

Information, Records and Documents Available in Accordance With Other Legislation – Section 51(1)(d)

Where applicable to our operations Kleuterskool Kwaggasrand keeps information / documents in accordance with certain Departments and their legislation (please note that this is not an exhaustive list).

1. Basic Conditions of Employment Act, No. 75 of 1997
2. Basic Conditions of Employment Amendment Act No. 12 of 2002
3. Broad-Based Black Economic Empowerment Act, No. 75 of 1997
4. Broad-Based Black Economic Empowerment Act, No. 53 of 2003
5. Business Act, No. 71 of 1991
6. Children's Act, No. 38 of 2005

7. Close Corporations Act, No. 69 of 1984
8. Companies Act, No. 71 of 2008
9. Compensation for Occupational Injuries & Diseases Act, No. 130 of 1993
10. Competition Act, No.71 of 2008
11. Constitution of the Republic of South Africa
12. Consumer Protection Act, No. 68 of 2008
13. Copyright Act, No. 98 of 1978
14. Department of Environmental Affairs
15. Department of Health and the Environmental Health Practitioner (EHP)
16. Department of Transport
17. Department of Water Affairs
18. Disclosure of Protected Information Act, No. 26 of 2000
19. Early Childhood Development Norms and Standards
20. ECD Forum and/or Association
21. Electronic Communication and Transactions Act, No. 25 of 2002
22. Employment Equity Act, No. 55 of 1998
23. Financial Intelligence Centre Act, No. 38 of 2001
24. General Data Protection Regulations
25. Health and Social Care Professionals Act 2005
26. Identification Act, No. 68 of 1997
27. Income Tax Act, No. 58 of 1962.
28. Intellectual Property Laws Amendment Act, No. 38 of 1997
29. International Standard for Records Management (ISO15489)
30. Labour Relations Act No. 66 of 1995
31. Labour Relations Amendment Act, No. 1 of 2002
32. National Archives and Records Service of South Africa Act, No. 43 of 1996
33. National Credit Act, No. 34 of 2005
34. National ECD Integrated Development Plan 2015
35. Non-profit Organisations Act, No. 71 of 1977
36. Occupational Health & Safety Act, No. 85 of 1993
37. Occupational Health and Safety Act, Act No. 85 of 1993.
38. Older Person's Act, No. 13 of 2006
39. Pension Funds Act, No. 24 of 1956
40. Promotion of Access to Information Act, No. 2 of 2000 (PAIA)
41. Promotion of Administrative Justice Act, No. 3 of 2000 (PAJA)
42. Protection of Personal Information Act, No. 4 of 2013 (POPIA)
43. Public Finance Management Act, No. 1 of 1999
44. Revenue laws Second Amendment Act. No 61 of 2008
45. Skills Development Act, No. 97 of 1998
46. Skills Development Levies Act, No. 9 of 1999
47. South African National Standard for Records Management (SANS 15489)
48. South African School's Act, No. 84 of 1996
49. Unemployment Insurance Act, No. 63 of 2001
50. Unemployment Insurance Act No. 30 of 1966
51. United Nations Convention on the Rights of the Child
52. Value Added Tax Act, No. 89 of 1991

We have tried our best to supply a comprehensive list of applicable legislation. It is possible that this list is incomplete and, when it comes to our attention that existing or new legislation allows a Requester access, this manual will be updated.

It is further recorded that accessibility of document and records may be subject to grounds of refusal as set out in this PAIA Manual.

Access to Records Only on Request - Section 51(1)(e)

1. No notice has been published on the categories of records that are automatically available without a person having to request access in terms of Section 52(2) of PAIA.
2. Access to records held by Kleuterskool Kwaggasrand may be accessed by requests only when the prerequisite requirements for access have been met.
3. A Requester is any person making a request for access to a record. There are two types of Requesters:
 - a. Personal Requester:
 - i. Is a person who is seeking access to a record containing Personal Information about themselves.
 - ii. We will provide the requested information or give access to the record and the prescribed fee will be charged.
 - b. Other Requester:
 - i. Is a person requesting access to information on third parties?
 - ii. When making the decision to deny or grant access we will strictly adhere to the provisions of the Act.
 - iii. We will take all reasonable steps to inform the third party that access to their information has been requested.
 - iv. If the information is deemed confidential the third party will be given the opportunity to allow or deny the request for access in writing before access will be considered.

Records Available without a Request in terms of the Act

1. Records of a public nature, such as those disclosed on Kleuterskool Kwaggasrand's website may be accessed without the need to submit a request in writing.
2. Other non-confidential records, such as statutory records maintained at CIPC or DSD, may also be accessed without the need to submit a formal application.
3. However, access to view any documents will still have to be made with the Information Officer.

Categories and Documents and Information Held by Kleuterskool Kwaggasrand

Category: Admissions	
Admission and Discharge Register	Medical Rules and Regulations for Parents
Admissions Agreement	Parent General Information
Admissions Application Form	
Admissions Policy	

Category: Companies Act	
All Minutes of Meetings	
Auditors, Directors	Records relating to the appointment of auditors, directors, prescribed Officers, Public Officer, Company Secretary,
Documents of Incorporation	Share certificates
Index of names of Directors	Share Register and other statutory registers

Category: Curriculum	
Assessments	Results of Children's Creative Activities
Daily Lesson Plans	Results of Children's Fine Motor Activities
Daily Observations	Weekly Activity Planner
Reports	

Category: Employment and Human Resources	
Application for Employment	Job Description Covid-19 Compliance Officer
Certificate of Service	Job Description POPIA Information Officer
Code of Conduct	Job Description POPIA Operator
Contact Details Lists	Leave Records
Disciplinary Action Procedures and documentation	Letter of Appointment Covid-19 Compliance Officer
Discipline and Grievance Policy and Agreement	Letter of Appointment Teaching Staff
Disciplinary Process Records	Letter of Appointment POPIA Information Officer
Employee Contact Details List	Letter of Appointment POPIA Operator
Employee Exit and Interview Questions	Letter of Appointment Staff
	Payroll reports / Wage Register
Employee Performance Analysis	Staff Attendance Register
Employment Agreement	Warning Procedures and documentation
Grievance Procedures and documentation	
Job Description Teaching Practitioner	
Job Description Teaching Assistant	

Category: Financial Records	
Accounting records	Inventory and Stock Take
Annual Financial Statements	Invoices and proof of payments
Asset Registers	Records of UIF payments
Bank account details	Regional Service Levies
Bank Statements	Rental Agreements
Banking records	Skills Development Levies (SITE Tax)
Debtors and creditors statements and invoices	Tax documents issued to staff
Financial policies and procedures	Tax Returns
General and subsidiary ledgers and journals	Workmen's Compensation payments
General reconciliations	
Income Tax and PAYE records	

Category: Health and Safety	
Accident and Incident Register	Emergency Medical Forms for Staff
Accident and Incident Report	Emergency Medical Forms for Children
Allergy Register	Emergency Preparedness and Evacuation Policy
Biting Policy	Emergency Risk Assessment
Building Plans	Form 22 – Reporting Suspicions of Child Abuse
Child Behavior Guidance Policy	Form 29 and 30 – Child Protection Register
Cleaning Registers	Head Lice Policy
COVID-19 Employee Declaration	Health and Safety Policy
COVID-19 PPE Register	Health and Safety Risk Assessment
Covid-19 Prevention and Control Policy	HIV and AIDS Policy
COVID-19 Risk Analysis	Infection Control and Communicable Diseases Policy
COVID-19 Symptom Checklist for Parents	Medication Administration Register
COVID-19 Symptoms Register	Nappy Changing and Toilet Training Policy
COVID-19 Temperature Registers	Nappy Changing Register
Emergency Escape Route diagram	Outings and Excursions Policy, Register and Indemnity
COVID-19 Temperature Registers	
Emergency Escape Route diagram	
	Outings and Excursions Policy, Register and Indemnity

Emergency Incident Report	Privacy Policy
Emergency Bomb Threat Checklist	Toilet Cleaning Register
Emergency External Team Contact Details	Toy, Games and Equipment Policy
	Training Manuals
	Training Records
	Visitor's Register and Temperature Check

Category: Information Technology	
Hardware / Electronic Device Asset Register	Software Register
Information security standards	System documentation and manuals
Software Licenses	Username and passwords for external websites and apps
	Username and passwords for internal systems

Category: Municipal and Provincial Compliance	
Electrical Compliance Certificate	Public Health Permit
Fire Clearance Certificate	Registration of a Partial Care
	Registration of an ECD Programme
	Rezoning or Special Consent Letter

Category: Procurement (Purchasing)	
Contracts with suppliers and vendors	Standard Terms and Conditions for suppliers and vendors
Purchase Requisitions	

Promotion of Access to Information	
Form C – Request for Information	Notices Granting Permission or Denial of Access

Protection of Personal Information and Record Keeping	
Document Change Record	Form 5 - Complaint of Interference With POPIA or Complaint Regarding Determination of An Adjudicator (Section 7)
Document Destruction Record	Permission from Data Subjects
Document Journey Record	For the Information Officer
Document Log (new and existing docs)	Form 11 - Request for An Assessment (Section 89(1))
For Data Subjects	Form 3 - Application for The Issue of A Code of Conduct (Section 61(1)(b))
Form 1 - Objection to The Processing of Personal Information (Section 11(3))	Form 4 - Application for The Consent of A Data Subject For The Processing of Personal Information For The Purpose of Direct Marketing (Section 69(2))
Form 11 - Request for An Assessment (Section 89(1))	Form 5 - Complaint Regarding Interference With The POPIA / Complaint Regarding Determination of An Adjudicator (Section 74)
Form 2 - Request for Correction, Deletion or Destruction of Personal Information Record (Section 24(1))	Guidance Note on Information Officers and Deputy Information Officers

Process to Request Access to a Record

1. The Requester must:
 - a. Comply with all the procedural requirements contained in the Act relating to requesting access to a record.
 - b. Complete the prescribed form (see Annexure A) with sufficient detail to allow the Information Officer to identify:
 - i. The records requested, and
 - ii. The identity of the Requester.Submit the request to the Information Officer or Deputy Information Officer at their physical address or sent through the post to the postal address.
 - c. Indicate which form of access is required.
 - d. Specify a postal address or email in the Republic of South Africa for the Records to be sent to.
 - e. State that he/she:
 - i. Requires the information to exercise or protect a right.
 - ii. Clearly state what that right is.
 - iii. Clearly specify why the record is necessary to exercise or protect such a right.
2. The request must be accompanied by the payment of the prescribed fee and, if applicable, a deposit.
3. Kleuterskool Kwaggasrand will process the request within 30 (thirty) days, unless the Requester has stated valid special reasons to the satisfaction of the Information Officer that circumstances dictate that the records are required sooner than the above time frame.
4. The Information Officer will notify the Requester of the outcome of their request to access in writing.
5. If the request is denied and the Requester asks for reasons for the denial to access, the Information Officer is obliged to respond and provide the particulars.
6. If a request is made on behalf of another person, then the Requester must submit proof that he/she is legally capacitated to make the request, to the satisfaction of the Information Officer.
7. If a person is unable to complete the prescribed form because of illiteracy or disability:
 - a. The Information Officer must assist them to fill out the form, or
 - b. They may make the request orally.
8. The Requester must pay the prescribed fee before any access will be granted.
9. If all the information is not provided by the Requestor, the process will be delayed until such time as it is provided.
10. The period of 30 days will not commence until all the information has been provided.
11. If possible, the Information Officer will extract parts of records when providing the information so as not to disclose unnecessary information that has not been requested.

Refusal of Access to Records

1. Kleuterskool Kwaggasrand has the right refuse a request for information when it relates to disclosing of Personal Information of a third party for the mandatory protection of:
 - a. The privacy of a third party who is a natural person or a deceased person or a juristic person.
 - b. Contractual agreements.
 - c. A third party's commercial information if it contains trade secrets, financial, scientific and/ any other information that could cause harm to their interests, negotiations and/or commercial competition.
 - d. Confidential information of third parties if it is protected in terms of any agreement.
 - e. The safety of individuals and the protection of property.
 - f. Records which would be regarded as privileged in legal proceedings.
2. Kleuterskool Kwaggasrand has the right refuse a request for information when it relates to disclosing of its own information for the mandatory protection of:
 - a. Any computer program or software which it owns and is protected by copyright.
 - b. Any research information if the disclosure would disclose the identity of ourselves, the researcher or the subject matter if it places the research at a disadvantage.

- c. All requests for information will be assessed on their own merits and in accordance with applicable legal principles and legislation.
3. If a requested record cannot be found or if the record does not exist, the Information Officer shall, provide an affidavit and notify the Requester that it is not possible to give access to the requested record.
4. This notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act.
5. If the record is found later the Requester shall be given access to it in the prescribed manner.

Remedies Available When Kleuterskool Kwaggasrand Refuses Access to Records

1. Internal Remedies:
 - a. Name of Kleuterskool Kwaggasrand does not have internal remedies and the decision made by the Information Officer is final.
 - b. Requesters will have to utilise external remedies if the request for information is refused, and the Requester is not satisfied.
2. External Remedies: If a Requester is dissatisfied with the Information Officer's refusal to disclose information, he/she may apply to a Court for relief within 30 (thirty) days.

Prescribed Fees

1. The Act provides for two types of fees, i.e.:
 - a. A request fee:
 - i. An administration fee to be paid by all Requesters except Personal Requesters.
 - ii. A Request Fee is not refundable.
 - b. An access fee:
 - i. Paid by all Requesters if a request for access is granted.
 - ii. This fee is inclusive of costs incurred by the private body in obtaining and preparing a record for delivery to the Requester.
2. When a request is received by the Information Officer, the Requester (other than Personal Requesters) shall pay the prescribed fee.
3. If searching for the record and preparing it for disclosure in the requested form takes more than the hours prescribed in the regulations, the Information Officer shall notify the Requester:
 - a. The amount access to the record will cost.
 - b. That the prescribed portion of the fees which would be payable if the request is granted must be paid as a deposit.
 - c. The balance of the access fee must be paid before the record will be released.
4. The access fee must be calculated to include:
 - a. The prescribed fee.
 - b. Process fees for:
 - i. Searching.
 - ii. Preparations.
 - iii. Making a physical copy of the record (if required).
 - iv. Time reasonably required more than the prescribed hours for the above functions.
5. The Information Officer will refund a deposit to the Requester if access to the record is denied and a deposit has been paid.

Fee Schedule

1. Reproduction Fees	
A-4 size page photocopy or part thereof	R1.10
A4 size photocopy or part thereof (black and white)	R1.10 per page or part thereof
A4 size printed copy or part thereof (Black and white)	R0, 75 per page or part thereof
Compact disk	R70.00

Memory stick	R70.00
A4 size printed images (colour)	R40.00 per page or part thereof
Electronic copy of visual images	R60.00
A4 size page of transcription of an audio record or part thereof	R20.00

2. Access Fees	
Time required to locate the record	R30.00 per hour or part thereof
A4 size photocopy or part thereof (black and white)	R1.10 per page or part thereof
A4 size printed copy or part thereof (Black and white)	R0.75 per page or part thereof
Compact disk	R70.00
Memory stick	R70.00
A4 size printed images (colour)	R40.00 per page or part thereof
Electronic copy of visual images	R60.00
A4 size page of transcription of an audio record or part thereof	R20.00
Electronic copy of an audio record	R30.00
Postal or courier fee	Actual postal or courier fee is payable

- Deposits:** If the Information Officer requires a deposit because in his/her opinion the processing and completion of the request will take more than 6 (six) hours the following regulations apply the amount of the deposit must be equal to 1/3 (one third) of the amount of the applicable access fee.
- Collection Fees:** The initial Request Fee of R50,00 should be deposited into Kleuterskool Kwaggasrand's bank account and a copy of the deposit slip or proof of payment, application form and other correspondence / documents, forwarded to the Information Officer.
- Request Fees:** Other than by a Requester requesting access to their own PI, when all other Requesters submit a request for access a fee of R50.00 is payable up-front before the Information Officer will process the request.
- All fees are subject to change as allowed for in the Act and consequently such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

Protection of Personal Information that is Processed by Kleuterskool Kwaggasrand

- Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party.
- Kleuterskool Kwaggasrand (the Responsible Party) needs Personal Information and Special Personal Information relating to both individual and juristic persons to carry out its core functions.
- The purpose of the information and the way it is obtained and processed is determined by the Responsible Party.

Personal Information of a Data Subject

- PI and SPI are processed lawfully, fairly, and transparently.
- Data Subjects are notified that their information is being collected in the forms of Privacy or Data Collection Notices.
Kleuterskool Kwaggasrand has a legal basis to collect and process information from Data Subjects in the form of consent.
- The information:
 - Is processed only for the purposes for which it was collected.
 - Will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
 - Is adequate, relevant, and not excessive for the purposes for which it was collected.
 - Is accurate and kept up to date.
 - Will not be kept for longer than necessary.
 - Is processed in accordance with integrity and confidentiality principles which includes physical and organisational measures to protect the information.
 - Is processed in accordance with the rights of Data Subjects who have the right to:
 - Be notified that Kleuterskool Kwaggasrand is collecting their PI and/or SPI.
 - Be notified in the event of a data breach.

- iii. Access the information we hold on them and that requests will be handled in accordance with this PAIA Manual.
- iv. Request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained PI and/or SPI.
- v. Reasonably object to our use of their information and request that it be deleted, destroyed, or erased.
- vi. Object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications.
- vii. Complain to the Information Regulator regarding an alleged infringement of any of their rights according to PAIA and POPIA.

Purpose of the Processing of Personal Information and Special Personal Information

1. For consumers of our services, i.e., parents and guardians of children:

- a. Perform duties in terms of our Admissions Contract.
- b. Operate and manage their fee accounts any applications, agreements and/or correspondence between them and Kleuterskool Kwaggasrand.
- c. Communicate, including direct marketing, by email, SMS, letter, telephone, face-to-face, or in any other form.
- d. Carry out market research and business analysis.
- e. Debt recovery.
- f. Updating information held.
- g. Comply with our statutory, regulatory, legal, and other obligations under various Acts.
- h. Perform any reasonably required purpose for other administrative and operational functions.
- i. To understand each child's family dynamic in order to support them and their parents in times of need.
- j.

2. For potential consumers:

- a. Verify information.
- b. Check credit rating.
- c. Direct marketing.
- d. Any other reasonable purpose as reasonably required by Kleuterskool Kwaggasrand's core business.

3. For children:

- a. To make, or assist in making, decisions about their care and education.
- b. To form a view of each child as an individual and to identify and/or improve the service that is being provided according to their needs.
- c. To identify areas of vulnerability in their health, immunity, mental and/or physical wellbeing.
- d. To monitor and evaluate a child's progress through a scaffolded curriculum.
- e. To be able to report their progress to parents and guardians from a knowledge base.

4. For employees:

- a. Perform duties in terms of our Employment Contract.
- b. Operate and manage any applications, agreements and/or correspondence between them and Kleuterskool Kwaggasrand.
- c. Communicate by email, SMS, letter, telephone, face-to-face, or in any other form.
- d. Carry out business analysis.
- e. Updating information held.
- f. Comply with our statutory, regulatory, legal, and other obligations under various Acts.
- g. General matters relating to employees:
 - i. Pension.
 - ii. Medical aid.
 - iii. Payroll and statutory levies, i.e., PAYE, SITE and UIF.
 - iv. Disciplinary action.
 - v. Training.
- h. Perform any reasonably required purpose for:
 - i. Other administrative and operational functions.
 - ii. Relating to their employment.

5. For employment candidates:

- a. Verification of applicant employees' information during recruitment process.
- b. Statutory requirements, e.g., Police Clearance, SACE registration, etc.

- c. Relating to their possible employment relationship.
- 6. For vendors, suppliers, extra-curricular providers, and other businesses:**
 - a. Verifying information and performing checks.
 - b. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties.
 - c. Bank account details for the electronic payment of invoices.
 - d. For account reconciliations.
 - e. Complying with our regulatory and other obligations.
 - f. Any other reasonably required purpose relating to our core services.

Categories of Data Subjects and Personal Information and Special Personal Information

Category: Consumers and Potential, i.e., Parents and Guardians of Children	
Personal Information	Special Personal Information
- Billing information - Email address - Emergency contact (if parent not available) - Full Names - Home and postal address - Marital status. If divorced, the custody and visiting arrangements. - Telephone numbers	- ID number - Medical aid number and main member details - Occupation and place of employment - Passport number if no SA ID - Payment arrangements - Race or ethnic origin

Category: Children	
Personal Information	Special Personal Information
- Admission and Discharge Dates - Age - Allergies¹ - Attendance Register - COVID-19 Temperature Screening Register and other information - Full name - Date of Birth - Medications (currently being administered)	- Child's medical history - ID number - Immunisation Records - When the child's met/is meeting his/her milestones - Birth certificates

Category: Employees and Employment Candidates	
Personal Information	Special Personal Information
- Age - Attendance Registers - Date of birth - Email address - Emergency contacts - Employment date - Full name and title - Gender - General practitioner contact details ² - Home and Postal addresses - Language - Marital status	- Any disabilities - Banking details - Details of payments to third parties (deductions from salary) - Disciplinary and grievance records - Driver's license - Employment contracts - Employment history - Forms 29 and 30 - Police Clearances - Identity number - Leave records. - Medical aid records

¹ Allergies are listed as PI and not SPI because, for the purpose of possibly saving the child's life, several people in the organization need to know which child has an allergy and to what.

² The Data Subject's general practitioner's contact details are here in case he/she is close by and it would be preferable to call them in an emergency.

• Number of dependents • Qualifications, where and when obtained. • Telephone numbers • Time sheets • Training records	• Passport number if no I • Performance appraisals • Probation evaluations • Race or ethnic origin • References • Remuneration/salary records • SACE and CPTD registration and details • SITE registration, details and records • Tax registration, details and records • UIF registration, details and records
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Category: Vendors, Suppliers, Extra-curricular Providers and Other Business (which may include employees)	
Personal Information	Special Personal Information
• Contact numbers • Directors' information • E-mail address • Identity and/or company information • Information about products or services • Name and contact details of organisation • Name and title of contact in the organisation • Other information not specified, reasonably required to be processed for business operations. • Postal and/or street address	• Bank account details • Complaints • Employment history if extra-curricular provider • Invoices, payment receipts, statements, and reconciliations • Qualifications if extra-curricular provider • Recommendations and references

Recipients of Personal Information

1. Any organisation or person that Kleuterskool Kwaggasrand uses to collect payments and recover debts or to provide a service on its behalf.
2. Any payment system we use.
3. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where we have a duty to share information.
4. Third parties to whom payments are made on behalf of employees.
5. Financial institutions from whom payments are received on behalf of data subjects.
6. Employees, contractors, and temporary staff

Cross border transfers of Personal Information

In the event that Kleuterskool Kwaggasrand is obliged to send information to a country outside of the Republic does not have sufficient data protection laws, we will apply for Prior Authorization before taking any action.

Objection to the Processing of Personal Information by a Data Subject

1. Data Subjects have the right, at any time, to object to the processing of their Personal Information and Special Personal Information in the prescribed manner subject to exceptions contained in this Paia Manual and POPIA.
2. Please see Annexure A, attached to this manual, for Form 1.

Request for Correction or Deletion of Personal Information

1. Data Subjects have the right, at any time, to that their Personal Information and Special Personal be corrected, updated or deleted. Information in the prescribed manner subject to exceptions contained in this Paia Manual and POPIA.
2. Please see Annexure B, attached to this manual, for Form 2.

Availability Of This PAIA Manual - Section 51(3)

1. This Manual is available for inspection at the offices of Kleuterskool Kwaggasrand free of charge.
2. Our offices are situated at:

181 Rod Street
Kwaggasrand
Pretoria
Telephone number: 012 386 6597
Email address: Ingrid.Strydom@pilog.co.za

3. Copies of this Manual may be obtained subject to payment of the prescribed fee at our offices.
4. The Manual is also available free of charge on our website: www.kwaggasrandnurseryschool.co.za.
5. A quote of the prescribed fee will be provided.
6. Access to the Manual can also be gained on the website of the SAHRC (www.sahrc.org.za) and that it will also be published in The Government Gazette.

Contact Details of the South African Human Rights Commission

PAIA Unit
29 Princess of Wales Terrace, Corner York and Andrew Streets, Parktown
Private Bag 2700, Houghton, 2041
Telephone + 27 11 484 8300
Telefax + 27 11 484 0582/1360
Website www.sahrc.org.za
E-mail PAIA@sahrc.org.za

Annexure A – Form C for the Objection to the Processing of Personal Information



J752

REPUBLIC OF SOUTH AFRICA

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 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.
(c) Proof of the capacity in which the request is made, if applicable, must be attached.

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

- | |
|--|
| <p>(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.</p> <p>(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.</p> |
|--|

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

.....

.....

.....

.....

2. Reference number, if available:

.....

.....

.....

.....

3. Any further particulars of record:

.....

.....

.....

.....

E. Fees

- | |
|---|
| <p>(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.</p> <p>(b) You will be notified of the amount required to be paid as the request fee.</p> <p>(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.</p> <p>(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.</p> |
|---|

Reason for exemption from payment of fees:

.....

.....

.....

.....

.....

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

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: 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.	Form in which record is required:
---	---

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 compliance with your request.

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

.....

Signed at this day..... ofyear

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE

Annexure B – Form 1 for the Objection to the Processing of Personal Information

FORM 1
OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

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Annexure C – Form 2 Request for Correction or Deletion of Personal Information

FORM 2

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF
SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)**

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:
☐

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	

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Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTRUCTED/ DESTROYED
D	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at this day of20.....

.....
Signature of data subject/ designated person

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