GRACE COLLEGE

PAIA MANUAL

PREPARED IN TERMS OF SECTION 51 OF
THE PROMOTION OF ACCESS TO
INFORMATION ACT NO. 2 OF 2000
("THE ACT" OR "PAIA")

This Manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (PAIA) for Grace College.

The Act enforces Section 32 of the South African Constitution (1996), granting the right of access to information. Section 51 mandates that all private entities provide a publicly accessible Manual outlining the process for requesting access to their records.

THE PURPOSE OF THE PAIA MANUAL

- Provide requesters with access to Grace College records under specific conditions.
- Foster transparency and accountability by making information accessible, allowing individuals and organisations to exercise and protect their rights.
- Implement the Promotion of Access to Information Act, No. 2 of 2000 (PAIA), which enforces the constitutional right to access information.
- Fulfil the requirements of Section 51 of PAIA, which mandates private bodies to compile a manual detailing their records, contact information, and the process for requesting access to those records.
- know the description of the categories of data subjects and of the information or categories of information relating thereto;

LIST OF ACRONYMS AND ABBREVIATIONS

CEO	Chief Executive Officer / Headmaster
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; and
Republic	Republic of South Africa

KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF GRACE COLLEGE

CHIEF INFORMATION OFFICER

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DEPUTY INFORMATION OFFICERS

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SAFEGAURDING OF INFORMATION: ACADEMICS	
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SAFEGAURDING OF INFORMATION: SPORT	
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SAFEGAURDING OF INFORMATION: ALUMNI AND FUNDRAISING	
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SAFEGAURDING OF INFORMATION: INFORMATION TECHNOLOGY	
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GRACE COLLEGE CONTACT DETAILS

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Website	www.gracecollege.co.za

HOW TO OBTAIN ACCESS TO THE GUIDE

The Information Regulator, in accordance with Section 10(1) of PAIA (as amended), has updated and made available a revised Guide on how to use PAIA . This Guide is designed to be easily understood and accessible to anyone wishing to exercise rights under PAIA and POPIA. The guide is available in all official languages and in braille.

The Guide contains a description of, inter alia-

- 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 PAIA1 and section 56 of POPIA2;

- the manner and form of a request for-
    - access to a record of a public body contemplated in section 113; and
    - access to a record of a private body contemplated in section 504;

- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the 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 Regulator; and
    - 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;
- the provisions of sections 14 5 and 51 6 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
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- the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 9211.
- 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.

  The Guide can be accessed on the Information Regulator's website or obtained from the Information Regulator's offices during normal working hours.

DESCRIPTION OF THE RECORDS OF GRACE COLLEGE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Subjects on which Grace College holds records	
Strategic Documents, Plans, Proposals	• Annual Reports, Strategic Plan, • Annual Performance Plan. • Founding documents. • Minutes of meetings
Human Resources	• HR policies and procedures • Advertised posts • Employee contracts, conditions of service. • Employee records (attendance, equity, pension, leave, police clearance, qualifications,) • Statutory records • Information relating to Health and Safety. • Minutes of meetings.
Marketing	• Prospective Client Database • Photo & Video Library • Supplier Database • News articles
Operations	• Parent & learner Records • Minutes of Meetings • Learner History • Learner Performance Measurements • Licences (categories)
Information Technology	• CCTV Footage • Pupil network access • Pupil Device Records • Client Database
Financial	• Budgets • Annual financial statements • Asset Register • Insurance records • Banking records • Contracts • Management accounts • Procurement • Stock • Tax records

RECORDS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

News Articles	• Available on the Website
Calendar Dates	
Annual Fee Structure	
Contact Information	

PROCESSING OF PERSONAL INFORMATION

Grace College collects personal information about learners and their families when necessary to:

- Process applications from prospective learners.
- Fulfil legal and regulatory requirements.
- Provide a safe, secure, and supportive school environment.
- Deliver quality education and monitor academic progress through assessments and reports.
- Provide appropriate pastoral care, including support for learners' social, emotional, and physical wellbeing.
- Communicate with parents about schooling matters and learner development.
- Make reasonable adjustments and provide support for learners with special educational needs.
- Administer learner records and entries for third-party assessments and the IEB.
- Issue references for current and former learners.
- Manage school operations, including billing, invoicing, and fee administration.
- Manage the Grace College campus and ensure health and safety (including CCTV use).
- Administer and implement school rules and policies.
- Maintain historical archives for operational and legacy purposes.
- Celebrate and promote learners' achievements through official channels such as newsletters, social media, the school magazine, website, and local publications.

Grace College also collects personal information about staff, prospective staff, and contractors when necessary for:

- Recruitment and appointment processes.
- Administration of staff and contractor records.
- Human resources, including appraisals, disciplinary procedures, and references.

DATA SUBJECTS AND OF THE INFORMATION

OR CATEGORIES OF INFORMATION RELATING THERETO

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	• name, address, registration numbers or identity numbers, employment status and bank details
Prospective Customers / Clients	• name, address, registration numbers or identity numbers, employment status, Child's Educational History
Service Providers	• names, registration number, vat numbers, address, trade secrets and bank details
Employees	• Name, address, identity numbers, police clearance employment equity, qualifications, gender and race

RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

Category of personal information	Recipients or Categories of Recipients to whom the persona information may be supplied
Identity number and names for criminal checks	• South African Police Services
Qualifications for verification	• South African Qualifications Authority
Credit information	• Credit Bureaus
Learner information and academic records	• Independent Examination Board (IEB)

GROUNDS FOR REFUSAL OF ACCESS

In accordance with Chapter 4 of the Promotion of Access to Information Act (PAIA), Grace College may refuse a request for access to records if such access would involve or result in the following:

- To protect the privacy of a third party (section 34);
- To protect commercial or financial information of a third party (section 36);
- To protect confidential information provided in confidence by a third party (section 37);

- If access would endanger the life, safety, or security of any person or property (section 38);
- If the record is legally privileged (section 40);
- To protect confidential research information of a third party or the school (section 43).

The record includes confidential research information, either from the school or another party.
Grace College will notify the requester in writing within 30 calendar days of receiving the completed Request for Access to Record Form, indicating whether the request has been approved or denied.

Should the requested record not exist or not be found, the Information Officer will provide the requester with an affidavit confirming the non-existence or unavailability of such a record.

TRANSBORDER FLOWS OF PERSONAL INFORMATION

In accordance with the Protection of Personal Information Act (POPIA), Grace College may transfer personal information across borders where necessary to fulfil its educational mandate and related purposes. Such transfers are permitted only if the receiving party is subject to laws, binding agreements, or conditions that provide an adequate level of protection for the information.

Transborder flows of personal information may occur in the following instances, among others:

- Where learners enrolled at the school are residents or citizens of another country.
- Where alumni reside outside the borders of the Republic of South Africa.
- When providing personal information to international universities or educational institutions for application, admission, or enrolment purposes.
- Where learners intend to study at institutions outside South Africa and the transfer of personal information is required to facilitate enrolment or applications.
- In the case of learner participation in international programmes, including exchange programmes, the President's Award, or overseas educational trips arranged or endorsed by the school.

All such transfers shall be conducted with appropriate safeguards in place, ensuring that the data subject's privacy rights are protected in compliance with applicable data protection laws.

DATA SECURITY

Grace College implements reasonable, appropriate, and adequate technical and organisational measures to protect personal information against unauthorised access, unlawful processing, accidental loss, destruction, damage, alteration, or disclosure.

The College regularly reviews and updates its information security practices and controls to ensure the ongoing integrity and confidentiality of personal information in its possession.

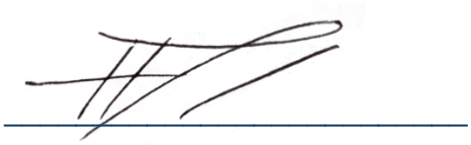
In the event that there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised party, Grace College will notify both the Information Regulator and the affected data subject as required under the Protection of Personal Information Act (POPIA).

Such notification may be delayed or withheld if the Regulator or a competent public authority determines that disclosure would likely impede a criminal investigation.

UPDATING OF THE MANUAL

The head of Grace College will on a regular basis update this manual.

Issued by



Mr Hendrik Lodewyk Jansen
Headmaster

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