



PAIA MANUAL



INSCAPE

SECTION 51 MANUAL
In terms of the Promotion to Access to Information Act no 2 of 2000 (as amended)

INSCAPE EDUCATION GROUP PROPRIETARY LIMITED
("the company")

2002/028979/07
Registration Number



HL BÜHRS
CHAIRMAN

CONTENTS

1. List of Acronyms and Abbreviations
2. The Purpose of PAIA Manual
 - 2.1 Objectives of the Act
 - 2.2 Scope of the Manual
 - 2.3 Company & Information Officer details
 - 2.4 Dissemination and Availability of the manual
3. Entry Point for Requests
4. Who may request access to information
5. Guidance to requestors
6. Records available in terms of other legislation
 - 6.1 Unlimited requestors
 - 6.2 Limited requestors
7. Procedure
 - 7.1 Prescribed access form
 - 7.2 Proof of identity
 - 7.3 Prescribed fees
 - 7.3.1 Reproduction Fees
 - 7.3.2 Request Fee
 - 7.3.3 Access Fee
 - 7.3.4 Deposit
8. Granting or refusal of requests
9. Appeal
10. Classes of records held by the company
 - 10.1 Scope
 - 10.2 Categories and subjects of records held
 - 10.3 Further information and assistance
11. Useful references
12. Annexure A – Prescribed forms for Access to a record of the Company

1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | |
|------------------------|---|
| 1.1 “CEO” | Chief Executive Officer |
| 1.2 “DIO” | Deputy Information Officer; |
| 1.3 “IO” | Information Officer; |
| 1.4 “Minister” | Minister of Justice and Correctional Services; |
| 1.5 “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended; |
| 1.6 “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 “Regulator” | Information Regulator; and |
| 1.8 “Republic” | Republic of South Africa |

2. PURPOSE OF THE 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 INSCAPE EDUCATION GROUP

- The Company is a private company incorporated in terms of the Company laws of the Republic Of South Africa.
- The main business of The Company is : Provision of Educational Services.
- The Company has no subsidiaries.
- The company employs 106 staff members.

3.1 Chief Information Officer and Head Office address:

Name: Helen Louise Buhrs
Physical Address: 193 Corobay Avenue, Waterkloof Glen, Pretoria, 0102

Postal Address: Postnet Suite 104, Private Bag X19, Menlo Park, 0102
Tel: +27 (12) 346-2189
Fax: NA
E-mail: admin@inscape.co.za
Website: www.inscape.ac

3.2 Deputy Information Officer

Name: Paul Mowat
Tel: 012 346 2189
Email: Paul.Mowat@Inscape.co.za
Fax Number: Na

3.3 Access to Information General Contacts

Email: admin@inscape.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-

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-*

- 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.*

- 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;
- 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.

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-

- (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.”

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 English, for public inspection during normal office hours

5. CATEGORIES OF RECORDS OF INSCAPE EDUCATION GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following information is available without special request. Records that are kept automatically available to the public are records of the Company lodged in terms of government requirements with various statutory bodies, including the Companies and Intellectual Properties Commission (“CIPC”) and the Registrar of Deeds, all marketing and advertising material published by the company and all records available on the company’s website.

5.1 On Request:

- PAIA Manual

5.2 Download from www.inscape.ac

6. DESCRIPTION OF THE RECORDS OF INSCAPE EDUCATION GROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

6.1 LIMITED REQUESTORS

Certain legislation mandates private bodies to allow certain person(s) access to specified information, upon request. Legislation that may be consulted to establish the type of information or record and the person(s) having access thereto is as follows:

- Basic Conditions of Employment Act 75 of 1997;
- Companies Act 71 of 2008;

- Consumer Protection Act 68 of 2008;
- Copyright Act 98 of 1978;
- Electronic Communications and Transactions Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Income Tax Act 58 Of 1962;
- Labour Relations Act 66 of 1995;
- Protection of Personal Information Act of 2013;
- South African Revenue Services Act of 1997;
- Skills Development Act 97 of 1998;
- Unemployment Contributions Act No 4 of 2002;
- Unemployment Insurance Act 63 of 2001;
- Higher Education Act 1997 Act 101 of 1997.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE INSCAPE EDUCATION GROUP

The following records are kept by the company :

- Financial records;
- Internal correspondence:
 - Minutes of director's meetings;
 - Minutes of shareholder meetings;
 - Minutes of management meetings;
 - Correspondence with third parties – 3 years; and
 - Minutes of management meetings;
- Agreements
 - Purchase and sale agreements;
 - Rental and lease agreements; and
 - Service and agency agreements;
- Personnel records
 - Letters of appointment;
 - Personnel information;
 - Leave records;

- Promotion/increment increase letters;
- Details of disciplinary hearings/matters; and
- Information technology records and databases;
- Financial records stored on server;
- Software license agreements;
- Safety records;
- Academic records of students.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The processing of personal information serves several crucial purposes, all aimed at supporting the educational mission, ensuring operational efficiency, and complying with legal and regulatory requirements. Here are some key reasons for processing personal information in higher education:

- 8.1.1 Admissions and Enrolment:** Personal information is processed to manage applications, admissions decisions, and enrolment processes. This includes collecting data such as academic records, contact details, and demographic information to facilitate the selection and registration of students.
- 8.1.2 Academic Support:** Personal information helps in providing academic support services to students, such as advising, counselling, tutoring, and accommodation services. This data helps institutions understand students' needs and provide appropriate assistance to ensure their academic success.
- 8.1.3 Education Delivery:** Personal information is used to deliver educational services effectively. This includes managing course registrations, timetabling, grading, and academic progress tracking. It ensures that students receive the necessary educational resources and support throughout their studies.
- 8.1.4 Research and Analysis:** Higher education institutions conduct research and analysis on student performance, institutional effectiveness, and educational trends. Personal data may be used in aggregated or anonymized forms to analyse outcomes, improve programs, and contribute to academic research.
- 8.1.5 Financial Aid and Billing:** Personal information is processed to administer financial aid programs, scholarships, grants, and student loans. It is also used for billing purposes, ensuring accurate tuition assessment and fee management.
- 8.1.6 Campus Safety and Security:** Personal information helps in ensuring campus safety and security by managing access controls, issuing identification cards, and monitoring campus activities. It supports emergency preparedness and response efforts.
- 8.1.7 Alumni Relations:** After graduation, personal information continues to be processed to maintain alumni relations. This includes outreach, fundraising activities, and maintaining connections with former students.
- 8.1.8 Compliance and Reporting:** Higher education institutions are subject to various legal and regulatory requirements, such as those related to student records (e.g., FERPA in the United States). Personal information processing ensures compliance with these regulations and facilitates required reporting to government agencies and accreditation bodies.
- 8.1.9 Institutional Planning and Management:** Personal information is used in institutional planning, strategic decision-making, and resource allocation. It helps in forecasting enrollment trends, assessing demographic changes, and aligning academic offerings with student and societal needs.
- 8.1.10 Communication and Engagement:** Personal information enables effective communication with students, faculty, staff, and other stakeholders. It supports notifications, announcements, newsletters, and other forms of engagement to foster a connected campus community.

Overall, the processing of personal information in higher education institutions is essential for supporting student success, institutional effectiveness, and compliance with legal obligations, all while maintaining the trust and privacy of individuals involved.

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
Students and Account Payers	Name, address, identity numbers, contact details, academic record, employment status and bank details
Service Providers	Names, registration number, vat numbers, address, contact detail and bank details
Employees	Address, identity numbers, contact details, qualifications, gender and race

8.2 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

NA

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

Ensuring the confidentiality, integrity, and availability of information gathered by an educational institution requires comprehensive information security measures. Here is a general description of such measures:

- 8.5.1 Access Control:** Implementing strong access control mechanisms ensures that only authorized personnel have access to sensitive information. This includes using role-

based access controls (RBAC), strong authentication methods (e.g., multi-factor authentication), and regular reviews of access rights.

- 8.5.2 Secure Authentication:** Employing robust authentication methods such as passwords, biometrics, or smart cards to verify the identity of users accessing the institution's systems and resources. Ensuring that passwords are complex and regularly updated enhances security.
- 8.5.3 Network Security:** Implementing firewalls, intrusion detection/prevention systems (IDS/IPS) (e.g.: *Mimecast*), and secure configurations for network devices to protect against unauthorized access and malicious activities. Regular network monitoring and logging are essential for detecting and responding to security incidents.
- 8.5.4 Endpoint Security:** Securing endpoints such as computers, laptops, and mobile devices with endpoint protection software, encryption, and regular patch management. This helps prevent malware infections and unauthorized access through vulnerable endpoints.
- 8.5.5 Physical Security:** Ensuring physical security measures are in place to protect information assets stored in physical form. This includes secure access controls to data centres, server rooms, and document storage areas, as well as surveillance and monitoring.
- 8.5.6 Data Backup and Recovery:** Implementing regular data backup procedures to ensure data availability in case of hardware failures, natural disasters, or cyber incidents. Testing backup and recovery processes periodically ensures their effectiveness.
- 8.5.7 Security Awareness Training:** Educating staff, students, and other stakeholders about information security best practices, policies, and procedures. This helps create a security-conscious culture and reduces the risk of human error leading to security breaches.
- 8.5.8 Incident Response Plan:** Developing and maintaining an incident response plan that outlines procedures for detecting, responding to, and recovering from security incidents. This includes roles and responsibilities, communication protocols, and steps for mitigating the impact of incidents.
- 8.5.9 Compliance and Auditing:** Regularly conducting security assessments, audits, and compliance checks to ensure adherence to internal policies, industry standards and regulatory requirements. Addressing any identified vulnerabilities or non-compliance issues promptly enhances overall security posture.
- 8.5.10 Vendor Management:** Ensuring that third-party vendors and service providers adhere to information security standards and guidelines through contractual agreements, audits, and regular monitoring. This includes managing risks associated with outsourcing of IT services and data processing.
- 8.5.11 Continuous Improvement:** Establishing a process for continuous monitoring, evaluation, and improvement of information security measures based on evolving threats, technological advancements, and lessons learned from security incidents.

By implementing these information security measures, educational institutions can effectively safeguard the confidentiality, integrity, and availability of the information they gather, thereby protecting their students, staff, and organizational assets from potential risks and threats.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is

available-

- On www.inscape.ac;

- To any person upon request and upon the payment of a reasonable prescribed fee; and
- 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.

USEFUL REFERENCES

The Human Rights Commission	http://www.sahrc.org.za/paia.htm
The Promotion of Access to Information Act	http://www.gov.za/gazette/acts/2000/a2-00.pdf

10. UPDATING OF THE MANUAL

The head of Inscape Education Group will on a regular basis update this manual.

Issued by

Helen Louise Bührs
Chief Executive Officer

Prescribed forms for access to a record of the company

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

[Regulation 10]

FOR DEPARTMENTAL USE

Reference number: _____

Request received by (state rank, name and surname of information officer/deputy information officer) on (date) at (place).

Request fee (if any): R _____

Deposit (if any): R _____

Access fee: R _____

SIGNATURE OF INFORMATION OFFICER/DEPUTY INFORMATION OFFICER

A. Particulars of public body

The Information Officer/Deputy Information Officer: _____

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be recorded below.*
- (b) Furnish an address and/or fax number in the Republic to which information must be sent.*
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname:

Identity number:

Postal address: _____

_____ Fax number: _____

Telephone 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 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 therefore.

Reason for exemption from payment of fees:

F. Form to request 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 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:		
<p><i>Mark the appropriate box with an "X".</i></p> <p>NOTES:</p> <p><i>(a) Your indication as to the required form of access depends on the form in which the record is available.</i></p> <p><i>(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.</i></p> <p><i>(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</i></p>			
1. If the record is in written or printed form -			
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
2. If record consists of visual images -			
(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images*
<input type="checkbox"/>		<input type="checkbox"/>	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* (disc)		
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? A postal fee is payable.			<table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> </table>	YES	NO
YES	NO				
<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available.</i>					
In which language would you prefer the record?					

G. Particulars of right to be exercised or protected

<i>If the provided space is inadequate, please continue on a separate folio and attach it to this form.</i>
The requester must sign all the additional folios.

1. Indicate which right 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 thereof 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 of _____ 20____

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE