



SPRINGFIELD CONVENT SCHOOL

Manual prepared in terms of

Section 51 of the Promotion of Access to Information Act (PAIA) 2 of /2000

1. INTRODUCTION

Springfield Convent School is an independent school providing educational services and governed by the provisions of the South African Schools Act 84 of 1996, as well as its own constitution. We are classified as a “private body” in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA”), which requires us to publish this information manual in order to inform people of the procedures to follow in order to exercise their rights to request access to information held by us in terms of PAIA.

Note that this information manual must be read in conjunction with the other policies forming part of our Information Protection Policy Framework, which outline the types of personal information that we process as well as the security measures that we take in respect of such personal information. This manual, as well as the entire policy framework, and the individual policies forming part thereof may be accessed on our website at www.springfieldconvent.co.za.

2. CONTACT DETAILS

Address

Springfield Convent School
St. John’s Road
Wynberg
Cape Town
7800

Junior School

Tel: +27 21 797 9637

Email: jnrpost@springfieldconvent.co.za

Senior School

Tel: +27 21 797 6169

Email: snrpost@springfieldconvent.co.za

Admissions office

Tel: +27 21 797 6169 ext 248

Email: admissions@springfieldconvent.co.za

Information Officer

In keeping with existing legislation, this role is fulfilled by the Head of School

Mr Geoffrey Quinn

Tel: +27 21 797 6169

Email: gquinn@springfieldconvent.co.za

Deputy Information Officer

Mr Hebrew-John Morgendal

Tel: +27 21 797 6169

Email: hmorgendal@springfieldconvent.co.za

3. ABOUT PAIA

PAIA gives effect to everyone's constitutional right of access to information held by private sector bodies or public bodies (i.e. government institutions) that is required for the exercise or protection of the requester's rights.

A guide to the Act is available from the South African Human Rights Commission ("SAHRC") website: www.sahrc.org.za. It describes, in each of official language:

- What the objective of this Act are;
- The details of each private body (where possible);
- The process that needs to be followed in order to make a request;
- How to get copies of the Guide at no charge;

- How to get access to the manual of a private body; and
- All the remedies available in law to you.

Should you have any queries in this regard, please contact the SAHRC directly at:

The South African Human Rights Commission: PAIA Unit

The Research and Documentation Department

Postal address:

Private Bag 2700

Houghton 2041

Tel: +27 11 887-3803

Fax: +27 11 403-0625

Website: www.sahrc.org.za E-mail: paia@sahrc.org.za

4. INFORMATION HELD BY US

The categories of records held by us are recorded in Schedule 1 of the Springfield Convent School Privacy Notice, which may be accessed on our website at www.springfieldconvent.co.za.

5. OTHER LEGISLATION IN TERMS OF WHICH ACCESS TO CERTAIN INFORMATION MAY BE GRANTED

In addition to PAIA, the following legislation may create rights and procedures in terms of which you may obtain certain records held by us:

- Skills Development Levies Act 66 of 1995
- Financial Intelligence Centre Act 38 of 2001
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Value Added Tax 89 of 1991
- Unemployment Insurance Act 63 of 2001
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- South African Schools Act 84 of 1996
- Protection of Personal Information Act 4 of 2013

6. EXERCISING YOUR RIGHTS IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

The Protection of Personal Information Act 4 of 2013 (“POPI”), grants data subjects certain rights relating to their personal information that is processed by us. This section highlights the said rights and how they may be exercised.

Please note that the Deputy Information Officer may require you to provide proof of your identity to his or her reasonable satisfaction, before taking further action in terms of any request made in terms of this paragraph 6.

The procedures contained in this paragraph 6 will also apply to requests for personal information relating to School pupils by their parents or legal guardians.

Withdrawal of authorisation

If we process your personal information because you have consented thereto, or because it is a requirement of a contract between us, you may withdraw your consent for the processing of your personal information by way of written notice to either the Information Officer or, in the event of a contractual relationship, in the manner provided for in the specific contract. Please note that such a withdrawal of consent may result in it becoming impossible for us to perform our obligations in terms of such contract, and may therefore constitute a repudiation of the contract by you, which may result in the contract being terminated.

Request for confirmation of records held

In terms of s23(1)(a) of POPI, you are entitled to request that we confirm, free of charge, whether we process any personal information pertaining to you.

You may exercise this right by way of an email addressed to the Deputy Information Officer, whose contact details are contained in paragraph 2 above. The Deputy Information Officer will respond to you in writing within a reasonable period of receiving your request.

Please note that we may refuse to grant your request on any of the grounds listed in PAIA (see paragraph 7 below for the most common grounds of rejection). In the event of such refusal, the grounds for refusal will be communicated to you by the Deputy Information Officer in writing.

Request for copies or description of records held

In terms of s23(1)(b) of POPI, you are entitled to request that we provide you with a description or copies of records containing your personal information, as well as confirmation of the identity of all third parties or categories of third parties, who have, or have had, access to such information.

You may exercise this right by way of an email addressed to the Deputy Information Officer, whose

contact details are contained in paragraph 2 above. The Deputy Information Officer will respond to you in writing within a reasonable period of receiving your request.

Please note that we may refuse to grant your request on any of the grounds listed in PAIA (see paragraph 7 below for the most common grounds of rejection). In the event of such refusal, the grounds for refusal will be communicated to you by the Deputy Information Officer in writing.

Request for correction of personal information

In terms of s24 of POPI, you are entitled to request that we correct or delete personal information about you in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or which you believe was obtained unlawfully, or to destroy or delete a record in respect of which you have withdrawn your authorization to allow us to process it.

A request in terms of this section must be submitted using the form prescribed in terms of POPI, a copy of which is annexed to this manual as **Schedule 1**. The form must be submitted by hand or email to the Deputy Information Officer, whose contact details are provided in paragraph 2 above. Copies of the form may also be downloaded from the website of the Information Regulator (<https://www.justice.gov.za/inforeg/>).

The Deputy Information Officer will attend to the request as soon as reasonably possible and provide you with written confirmation once the requested correction has been made.

Objections to processing of personal information

In terms of s11(3) of POPI, you may object to our processing of your personal information if the reason for such processing relates to:

- The protection of a legitimate interest of yours
- The pursuit of our legitimate interests or those of a third party to whom the information is supplied
- Direct marketing other than direct marketing by means of unsolicited electronic communications

In such instances, you may lodge an objection in writing with the Deputy Information Officer, whose contact details are provided in paragraph 2 above, by using the form prescribed in terms of POPI, a copy of which is annexed to this manual as **Schedule 2**. Copies of the form may also be downloaded from the website of the Information Regulator (<https://www.justice.gov.za/inforeg/>).

7. PAIA INFORMATION REQUESTS

Any request for information that does not relate to your rights in terms of POPI, as set out in paragraph 6 above, must follow the procedures contained in this paragraph 7.

Submitting a request

Please complete the request form prescribed in terms of PAIA, a copy of which is annexed to this manual as **Schedule 3**. Copies of the form may also be downloaded from the website of the South African Human Rights Commission (<https://www.sahrc.org.za/>).

When completing the request form, please ensure that you provide sufficient information to enable us to adequately identify:

- The records requested
- The identity of the requester
- Which form of access is required, if the request is granted
- The contact information of the requester
- The right which you are seeking to protect or enforce by means of the records requested (access to the records must be “necessary” for the exercise or protection of the right so stated, otherwise we may refuse your request).

Please note that, if you are making the request on behalf of another person, you must submit proof of your authority to do so, to the reasonable satisfaction of the Deputy Information Officer.

Persons who are disabled or illiterate may approach the Deputy Information Officer in person to make a request verbally.

Once completed, please send the form and any supporting documents via email to the Deputy Information Officer, whose contact details appear in paragraph 2 above.

Prescribed fees

In terms of PAIA, we are entitled to charge a prescribed fee for all information requests that are not “personal requests.” Personal requests are those dealt with in paragraph 6 above (requests relating to your own personal information).

PAIA allows us to charge a request fee of R50.00, as well as an access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

The request fee must be made following the submission of the prescribed request form and proof of payment must be submitted. We are not required to consider your request until the request fee has been paid.

If the search for and preparation of the record, including arrangement to make it available in the requested form, requires more than the hours prescribed by PAIA (6 hours), the Deputy Information Officer will request you to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

If your request is granted, you may be required to pay the applicable access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form. The Deputy Information Officer will notify you of the applicable fees, which must be paid before the requested information is provided to you.

If your request is refused and you were required to pay a deposit, you are entitled to be refunded such deposit (note that this applies to the deposit in respect of access fees and not to the R50.00 request fee).

Please refer to **Schedule 4** of this manual for a breakdown of the prescribed fees.

Considering requests

We will only be required to consider your request once the prescribed form and supporting documentation has been submitted and prescribed fees, if applicable, have been paid.

Except in cases where PAIA provides for the extension of time periods, your request will be considered, and a written response provided by the Deputy Information Officer or their duly authorised representative within 30 days of proper submission of the request. You may provide a written motivation with your request as to why the standard time periods should not be followed and we may, in our sole discretion, choose to dispense with such time periods based on your motivation.

Please note that your request may be refused based on one or more grounds set out in PAIA, including the following grounds:

- That disclosure of the requested information is not reasonably necessary to enforce a specified right, or that you have failed to adequately describe what right you seek to enforce or to provide sufficient reasons as to why the disclosure is necessary to enforce such right.
- Where we are required to protect the privacy of a third party who is a natural person, where your request would involve the unreasonable disclosure of personal information of that natural person.
- Where we are required to protect the commercial information of a third party, if the requested record contains trade secrets of that third party; financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; or information disclosed in confidence by a third party to us, if

the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

- Where we are required in terms of a contract to protect the confidential information of a third party.
- If the disclosure could endanger the life or safety of individuals or compromise the security of movable or immovable property.
- To protect records which are legally privileged.
- To protect the confidentiality of our own commercial records, including our own trade secrets, financial, commercial, scientific or technical information if disclosure would likely cause harm to our financial or commercial interests.
- Protecting research information relating to us or a third party, if its disclosure would disclose our identity, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

Appeal against decision of Deputy Information Officer

If you are not satisfied with the decision of the Deputy Information Officer relating to your information request, you may submit a written appeal to the Chairperson of the School's Board of Governors ("the Board"), for consideration by the Board.

Your appeal should include your original request and all supporting documentation, as well as the reasons as to why you are not satisfied with the Deputy Information Officer's decision and the relief sought. Your appeal must be submitted within 10 days of the Deputy Information Officer's decision.

Once submitted, your appeal will be considered by the Board at its next meeting. The Chairperson will then advise you in writing of the Board's decision relating to your appeal, as well as the reasons for the decision. This decision will be final and, should you remain unsatisfied with the decision, you are entitled to apply to a court with appropriate jurisdiction for further relief.

SCHEDULE 1

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 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

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

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:	
Contact number(s):	
Fax number/E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/DESTROYED

D	<p>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.</p> <p><i>(Please provide detailed reasons for the request)</i></p>
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Signed at this..... day of 20

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

SCHEDULE 2

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

<i>Note:</i>	
<p>1 Affidavits or other documentary evidence as applicable in support of the objection may be attached.</p> <p>2 If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.</p>	
<i>Complete as is applicable.</i>	
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)
Signed at	this..... day of 20
.....	
<i>Signature of data subject/designated person</i>	

SCHEDULE 3

REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

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Fax number:

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Mark with an "X"

Request is made in my own name Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B): <table border="1" style="display: inline-table;"><tr><td style="width: 150px;"> </td></tr></table> Facsimile: <table border="1" style="display: inline-table;"><tr><td> </td></tr></table>		
Cellular: <table border="1" style="display: inline-table;"><tr><td> </td></tr></table>			
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	

Reference number, if available	
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Any further particulars of record	

TYPE OF RECORD
(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <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>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

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

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made.

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

SCHEDULE 4

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<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>)	

Kindly note that your request has been:

- Approved
- Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy	R1.10		
Printed copy	R0.75		
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-sizepage	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: FIRST NATIONAL BANK
 Name of account holder: SPRINGFIELD CONVENT SCHOOL
 Type of account: CURRENT
 Account number: 50160036635
 Branch Code: 250655
 Reference Nr: Name and account number
 Submit proof of payment to: accounts@springfieldconvent.co.za

Signed at _____ this _____ day of _____ 20 _____

 Information officer