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Administered by Crossroads Trust NPO Reg No 000-733 • PBO No. 130000 409

PAIA MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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

2. Overview of Crossroads School

Crossroads School is an organisation in the field of remedial, primary education within the education sector. The school caters to learners with mild to moderate learning disabilities between the ages of 6 -14 years from grade R-7. The school is registered with the Department of Education and is a member of the Independent Schools Association Southern Africa (ISASA).

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2 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;
- 3.3 know the description of the records of the body which are available in accordance with any other legislation;
- 3.4 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;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 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;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 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
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE CROSSROADS TRUST t/a CROSSROADS SCHOOL

4.1 Chief Information Officer

Name: VALERIE JEAN WITT
Tel: 011 782 5378
Email: principal@crossroadsschool.co.za
Fax number: 011 888 7415

4.2 Deputy Information Officers

Name: YOLANDI ROUX
Tel: 011 782 5378
Email: yolandi@crossroadsschool.co.za
Fax Number: 011 888 7415

Name: ANNE SAUNDERS
Tel: 011 782 5378
Email: Anne@crossroadsschool.co.za
Fax Number: 011 888 7415

4.3 Access to information general contacts

Email: popia@crossroadsschool.co.za
info@crossroadsschool.co.za

4.4 School Address

Postal Address: PO BOX 87432
HOUGHTON
JOHANNESBURG
2041

Physical Address: 106 Thirteenth Street
Victory Park
Johannesburg
2194

Telephone: +27 11 782 5378
Email: popia@crossroadsschool.co.za

5 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1 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.
- 5.2 The Guide is available in each of the official languages and in braille.
- 5.3 The aforesaid Guide contains the description of-
- 5.3.1 the objects of PAIA and POPIA;
 - 5.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 5.3.2.1 the Information Officer of every public body, and
 - 5.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 5.3.3 the manner and form of a request for-
 - 5.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 5.3.3.2 access to a record of a private body contemplated in section 50⁴;
 - 5.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 5.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 5.3.6 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-
 - 5.3.6.1 an internal appeal;
 - 5.3.6.2 a complaint to the Regulator; and

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.*

- 5.3.6.3 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;
- 5.3.7 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;
- 5.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 5.3.10 the regulations made in terms of section 92¹¹.
- 5.4 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.
- 5.5 The Guide can also be obtained-
 - 5.5.1 upon request to the Information Officer;
 - 5.5.2 from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 5.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:
 - ENGLISH
 - AFRIKAANS

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.”

6 CATEGORIES OF RECORDS OF THE CROSSROADS TRUST t/a CROSSROADS SCHOOL WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following information is made known automatically and does not have to be requested by completing Form C: school website; fees schedule; internal school policies; all marketing brochures.

7. DESCRIPTION OF THE RECORDS OF CROSSROADS TRUST t/a CROSSROADS SCHOOL WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Information is available in terms of the following legislation to the persons or entities specified in such legislation, as well as the specific protections offered by such laws. As legislation changes from time to time, and new laws may stipulate new manners and extend the scope of access by persons specified in such entities, this list should be read as not being a final and complete list.

- Business legislation (including all regulations issued in terms of such legislation):
The Companies Act 71 of 2008; Income Tax Act 58 of 1962; Value Added Tax Act 89 of 1991; Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998; Skills Development Levies Act 9 of 1999; Unemployment Insurance Act 63 of 2001; Electronic Communications and Transactions Act 25 of 2002; Telecommunications Act 103 of 1996; Electronic Communications Act 36 of 2005; Consumer Protection Act 68 of 2008; Broad-based Black Economic Empowerment Act 53 of 2003; National Credit Act 34 of 2005; Long-term Insurance Act 52 of 1998; etc.
- Health legislation (including all regulations issued in terms of such legislation):
(This legislation is of extreme relevance in the health sector and Requesters should familiarise themselves with it.) The National Health Act 61 of 2003; Medical Schemes Act 121 of 1998; Medicines and Related Substances Act 101 of 1965; Children’s Act 38 of 2005; Mental Healthcare Act 17 of 2002; Choice on Termination of Pregnancy Act 92 of 1996; Sterilisation Act 44 of 1998; Health Professions Act 56 of 1974; etc.
- Education legislation (including all regulations issued in terms of such legislation)

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CROSSROADS TRUST t/a CROSSROADS SCHOOL

We hold records in the categories listed below. The fact that we list a record type here does not necessarily mean that we will disclose such records, and all access is subject to the evaluation processes outlined herein, which will be exercised in accordance with the requirements of the Act.

Records	Subjects	Availability
Internal records relating to our business	founding and other documents, minutes and policies; annual and other reports; financial records; operational records, policies, and procedures; contracts; licenses, trademarks and other intellectual property; production, marketing records; other internal policies and procedures; internal correspondence; statutory records; insurance policies and records; etc.	
Personnel records	records relating to temporary employees, fixed-term employees, part-time employees, permanent employees, locums, associates, contractors, partners, directors, executive directors, non-executive directors. It includes personal files and similar records, records that third parties have provided to us about their personnel; employment contracts, conditions of employment; workplace policies; disciplinary records; termination records; minutes of staff meetings; performance management records and systems and all employment related records and correspondence.	
Client/patient records	client/patient lists; health records; medical reports; funding records; agreements; consents; needs assessments; financial and accounts information; research information; evaluation records; profiling; and similar information. It must be noted that, in the health sector, personal and patient information are protected by legislation and ethical rules, and disclosure can only take place, if at all, without those frameworks.	
Supplier and service provider records	supplier registrations; contracts; confidentiality agreements and non-disclosure agreements; communications; logs; delivery records; commissioned work; and similar information, some of which might be provided to us by such suppliers and providers under service and other contracts.	
Technical records	manuals, logs, electronic and cached information, product registrations, product dossiers, health professionals council / statutory body records,	

	approvals, conditions and requirements, trade association information, and similar product information.	
Third-party information	may be in our possession but which would be subject to the conditions set in relation to such possession and use or purpose limitations.	
Environment and market information	information bought publicly available information and commissioned information that pertains to the specific sector and market of our business and factors that affect the business, professional, and healthcare environment.	
Financial	Annual Financial Statements Audited Financial Statements Financial and tax records Asset register Management accounts	Request in terms of PAIA

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

The purpose of processing personal information at Crossroads School is to ensure the effective performance of its functions and services and to meet any legislative requirements.

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Parents/learners	name, address, registration numbers or identity number, employment status, telephone numbers, medical aid details, allergies, marital status and bank details, gender and religious status (optional).
Service Providers	names, registration number, vat numbers, address, telephone numbers and bank

	details
Employees	ID document, name, address, telephone number, next of kin, address, qualifications, gender, race, medical aid details, disabilities, religious status (optional).

9.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identify numbers and names for criminal checks.	South African Police Services
Contact details of parents	School photographer
Qualifications, for qualification verifications	South African Qualifications Authority Quality Assurance bodies i.e. Umalusi

9.4 Planned transborder flows of personal information

Permission will be requested from parents before sharing personal information with a transborder educational institution.

9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information

The school uses a range of security safeguards and these are regularly reviewed and updated. They included but are not *limited to*, 2-factor verification for employee google workplace accounts, Data Encryption; Anti-virus and Anti-malware Solutions and Hardware Firewall with Security stack.

10 AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available-

10.1.1 on <https://www.crossroadsschool.co.za/>

10.1.2 at the physical address of CROSSROADS TRUST t/a CROSSROADS SCHOOL for public inspection during normal business hours;

10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4 to the Information Regulator upon request.

10.2 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.

11 UPDATING OF THE MANUAL

The Principal of CROSSROADS TRUST t/a CROSSROADS SCHOOL, supported by the POPIA working committee, will on a regular basis update this manual.

12 HOW TO REQUEST ACCESS TO RECORDS HELD BY CROSSROADS SCHOOL

Requests for access to records held by Crossroads School must be made by email request using Form 2 available on our website and on the Regulators website. The form can also be completed and delivered to reception for attention of the Information Officer. When a record is requested, the following will apply:

- Fees may be payable. These fees are prescribed by law, and can change from time to time.
- The prescribed Request Form (Form 2) must be completed. It can be obtained from the Information Officer, on the school's website (<https://www.crossroadsschool.co.za/>), on the Regulator's website (<https://www.justice.gov.za/infoereg/docs2-f.html>).
- On the Request Form all details must be completed.
- All requests will be evaluated against the provisions of the Act. The Act allows the Information Officer to refuse access on grounds stipulated in the Act. One can, for example, not access another person's confidential information, or trade- or commercial secrets of a business.
- An answer to a request for information must be made within 30 days of the request. If not granted and/or the requester is not satisfied s/he can approach the Regulator or the courts within 180 days.

13. PRESCRIBED FEES

Fee information with regards to requesting records from Crossroads School is available on request from the Deputy Information Officers. Fees will be determined in accordance with the Act.

Issued by



VALERIE JEAN WITT

PRINCIPAL and INFORMATION OFFICER