

PAIA MANUAL

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

This manual applies to
CURRO HOLDINGS LIMITED
Registration number 1998/025801/06
(including all subsidiaries)

1 July 2022

Registered office address:

38 Oxford Street
Durbanville
Cape Town
Western Cape
7550

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1. List of acronyms and abbreviations

- 1.1 'CURRO' Curro Holdings Ltd
- 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 'Republic' Republic of South Africa

2. Purpose of the PAIA manual

The purpose of Curro's PAIA Manual is useful for persons requesting information held by Curro, to:

- 2.1 Verify the categories of records held by a body which are available without them having to submit a formal PAIA request.
- 2.2 Have a sufficient understanding of how to make a request for access to a record held by Curro, by providing a description of the subjects on which Curro holds records and the categories of records held on each subject.
- 2.3 Publish the description of the records of Curro 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 a requester with the records they intend to access.
- 2.5 Know the description of the guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to it.
- 2.6 Know if Curro 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 Curro 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.

3. Key contact details of access to information held by Curro

3.1. Chief Information Officer

Name: Ms Marí Lategan
Physical address: 38 Oxford Street, Durbanville, Cape Town, Western Cape, 7550
Postal address: PO Box 2436, Durbanville, 7551
Telephone number: 021 979 1204
Email address: paainfo@curro.co.za

3.2. Deputy Information Officers

Name: Mr Louis Booyse
Physical address: 38 Oxford Street, Durbanville, Cape Town, Western Cape, 7550
Postal address: PO Box 2436, Durbanville, 7551
Telephone number: 021 979 1204
Email address: paainfo@curro.co.za

Name: Mr Mark Hodgson
Physical address: 38 Oxford Street, Durbanville, Cape Town, Western Cape, 7550
Postal address: PO Box 2436, Durbanville, 7551
Telephone number: 021 979 1204
Email address: paainfo@curro.co.za

Name: Mr Shaun McMurtry
Physical address: 38 Oxford Street, Durbanville, Cape Town, Western Cape, 7550
Postal address: PO Box 2436, Durbanville, 7551
Telephone number: 021 979 1204
Email address: paainfo@curro.co.za

Name: Ms Natasha Mkhize
Physical address: 38 Oxford Street, Durbanville, Cape Town, Western Cape, 7550
Postal address: PO Box 2436, Durbanville, 7551
Telephone number: 021 979 1204
Email address: paainfo@curro.co.za

Name: Mr Riaan Vlok
Physical address: 38 Oxford Street, Durbanville, Cape Town, Western Cape, 7550
Postal address: PO Box 2436, Durbanville, 7551
Telephone number: 021 979 1204
Email address: paainfo@curro.co.za

3.3. Access to information general contacts

Email: paiainfo@curro.co.za

3.4. Head Office

Physical address: 38 Oxford Street, Durbanville, Cape Town, Western Cape, 7550

Postal address: PO Box 2436, Durbanville, 7551

Telephone number: 021 979 1204

Email address: engage@curro.co.za

Website: <https://www.curro.co.za>

4. Guide on how to use PAIA and how to obtain access to the guide

4.1 The Information 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 PAIA ¹ 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;

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.*

- 4.3.4 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 of duty conferred or imposed by PAIA and POPIA, including the manner of lodging
 - 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 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 regulations made in terms of section 92¹¹.
- 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/inforeg/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 4.6.1 English; and
 - 4.6.2 Afrikaans.
- 5. Categories of records of Curro which are available without a person having to request access**
- 5.1 No notice has been published pursuant to Section 51(1)(b)(ii), regarding the categories of records which are automatically available without having to request access in terms of the Act.
- 5.2 The following records are automatically available at the registered office of Curro on payment of the prescribed fee for reproduction:

- 5.2.1 All information pertaining to Curro on its website at <https://www.curro.co.za> is available for inspection and does not need to be requested in terms of the Act.
- 5.2.2 Records of the company lodged in terms of government requirements such as the Registrar of Deeds.
- 5.2.3 Documentation and information relating to the company which is held by the Companies and Intellectual Properties Commission in accordance with the requirements set out in set out in section 25 of the Companies Act 71 of 2008.
- 5.2.4 Marketing material and other brochures.
- 5.2.5 News and other marketing Information.

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 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

⁹Section 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. Description of the records of Curro which are available in accordance with any other legislation

Applicable Legislation	Category of Records
Basic Conditions of Employment Act 75 of 1997	Particulars of work, employee records and employee payment records and employee contracts.
Broad-Based Black Economic Empowerment Act 53 of 2003	BBBEE Certificate
Compensation for Occupational Injuries and Disease Act 130 of 1993	Compensation payments, assessments and letter of good standing
Companies Act 71 of 2008	Memorandum of Incorporation; Notice of registered office and postal address; Minutes of Board Meetings
Employment Equity Act 55 of 1998	Employment Equity Plan
Income Tax Act 58 of 1962	Income Tax returns for past 5 (five) years; Clearance certificate
Promotion of Access to Information Act 2 of 2000	PAIA Manual
Protection of Personal Information Act 4 of 2013	Personal Information of employees, parents and guardians and learners
Unemployment Insurance Act 63 of 2001	Registration and declaration of employees
Unemployment Contributions Act 4 of 2002	Contribution records
Value Added Tax Act 89 of 1991	VAT returns for past 5 (five) years; Clearance certificate
Skills Development Act 9 of 1999	Workplace Skills Plan and Annual Training Report (ATR)
South African Schools Act 84 of 1996	Learner documentation as prescribed
Stock Exchanges Control Act 1 of 1985 and the Rules and Listing Requirements of the JSE Securities Exchange issued in terms thereof	Documentation as prescribed
Trade Marks Act 194 of 1993	Registration Certificates

7. Description of the subjects on which Curro holds records and categories of records held on each subject by Curro

Subjects on which the body holds records	Categories of records
7.1 Company information	<ul style="list-style-type: none"> • Trademarks • Databases • Information Technology • Marketing records • Internal correspondence • Operational records • Product-related records • Internal policies and procedures • Compliance records • Shareholder records • Records relating to board members • Minutes of meetings (including resolutions taken) • Company register and other statutory company records • Shareholding in subsidiaries • Contractual records and information relating to suppliers, service providers, contractors, professional advisors (such as attorneys and auditors) and financiers.
7.2 Human resources records	<ul style="list-style-type: none"> • Personal records provided by employees of Curro • Salary records • Conditions of employment and other personnel-related contractual and quasi-legal records • Internal evaluation records • UIF records • PAYE records • Leave records • Training records • Human Resources policies and procedures • Advertised positions
7.3 Financial records	<ul style="list-style-type: none"> • Annual reports • Management reports • VAT returns • Income tax returns and assessments • Invoices • Receipts • SETA returns • Asset records • Insurance policies and claims

Subjects on which the body holds records	Categories of records
7.4 Customer-related records (relating to parents or guardians and learners)	<ul style="list-style-type: none"> • Records provided by a customer/client • Records generated internally by or within Curro relating to customer/clients including transactional records • Contractual records
7.5 Safety, health and environmental (SHE) documents and records	<ul style="list-style-type: none"> • SHE mandatory agreements • Records relating to incidents in the workplace • Corrective action records • Occupational Health and Safety minutes and records • Compensation for Occupational Injuries and Diseases records • Risk Management Framework • Policies and Procedures Manual
7.6 Information technology documents and records	<ul style="list-style-type: none"> • Software licences • Software programmes • Software applications • Computer generated databases • Email communications • Performance statistics • General correspondence
7.7 Marketing and communications	<ul style="list-style-type: none"> • Brochures and publications • Media releases • Bursary programmes

8. Processing of personal information

8.1 Purpose of processing personal information

Curro processes personal information to:

- 8.1.1 provide its services to parents and/or guardians and learners.
- 8.1.2 administer its various education programs.
- 8.1.3 operate all its facilities.
- 8.1.4 comply with statutory obligations, including submissions to the Companies and Intellectual Property Commission, as well as interacting with regulatory authorities.
- 8.1.5 conduct business case analysis.
- 8.1.6 for purposes relevant to Curro's business activities.
- 8.1.7 conduct Curro's recruitment processes, including referrals, and hiring processes, which includes the capturing of personal details and the providing of status updates to an applicant as well as conducting criminal record and credit checks.

- 8.1.8 retain and make information available on the Curro website.
- 8.1.9 provide relevant marketing material and other information.
- 8.1.10 communicate with stakeholders and keep a record of all communications.
- 8.1.11 maintain and update Curro's customer or potential customer databases.
- 8.1.12 establish and verify the identity of visitors to the Curro website.
- 8.1.13 operate, administer, maintain, secure, and develop the Curro website and the performance and functionality thereof.
- 8.1.14 inform stakeholders about changes to the Curro website, privacy notice or other relevant changes.
- 8.1.15 diagnose and resolve technical issues and customer support and user queries.
- 8.1.16 protect all of Curro's rights in any litigation.
- 8.1.17 detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorized use of the Curro website and/or contravention of Curro's privacy notice or of the terms and conditions that apply to the use of the Curro website.
- 8.1.18 to create user profiles and analyse and compare how users make use of the Curro website, including (without limitation) habits, click-patterns, preferences, frequency and times of use, trends and demographics.
- 8.1.19 to analyse and compare the kinds of access devices that make use of and where they are used.

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
Parents and/or guardians	name, address, identity numbers, employment status, medical aid numbers, phone numbers, bank details, credit records
Learners	name, address, identity numbers, phone numbers, academic records and disciplinary records
Employees	name, address, identity numbers, medical aid numbers, phone numbers, bank details address, qualifications, gender and race and disciplinary records
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details

8.3 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
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history of parents and/or guardians, for credit information	Credit Bureaus
Employee Identity number, names and qualifications of registration and verification purposes	Umalusi, Department of Basic Education, IEB,
Learner Identity numbers, names and grades for examination registration and verification purposes	Umalusi, Department of Basic Education, IEB
Employee Identity number, names addresses and qualifications for Payroll purposes	Omega People Solutions (External HR consultants)

8.4 Planned transborder flows of personal information

8.4.1 Curro will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so:

8.4.1.1 Only in accordance with South African legislative requirements.

8.4.1.2 If the data subject consents to transfer of their personal information to third parties in foreign countries.

8.4.2 Curro will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of POPIA.

8.4.3 Curro will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards.

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.

8.5.1 Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Curro and its operators. In

terms of POPIA, operators are third parties that process personal information on behalf of Curro.

8.5.2 Curro continuously implement and monitor technical and organisational security measures to protect the personal information it holds, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

8.5.3 These measures may include practices such as retaining personal information on a secure server protected by a firewall, the transmission of sensitive information using a Secure Sockets Layer (SSL), internal reviews of all Curro practices and privacy policies and implementation of physical security measures to protect against unauthorized access.

9. Availability of the manual

9.1 A copy of the Manual is available-

9.1.1 on www.curro.co.za.

9.1.2 head office of Curro for public inspection during normal business hours

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

9.1.4 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.

10. Updating of the manual

The information officer of Curro will on a regular basis update this manual.

Issued by

m. Lategan

13 July 2022

Marí Lategan

(Information Officer: Executive Corporate Services)