

## **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 March 2021

Registered office address:

38 Oxford Street

Durbanville

Cape Town

Western Cape

7550

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Note: This manual is based on the blueprint issued by the South African Human Rights Commission (“SAHRC”) amended to include the requirements of the POPI Act.

## 1. Introduction

- 1.1 The Promotion of Access to Information Act 2 of 2000 ('the Act') came into operation on 9 March 2001 and gives effect to the constitutional right of access to information that is enshrined in section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa, No. 108 of 1996 ('the Constitution'). Section 32 of the Constitution provides that everyone has the right to access any information held by the state or by another person, where such information is required for the exercise or protection of any rights.
- 1.2 The Act accordingly requires that procedures be put in place by public and private bodies to enable persons to obtain access to records swiftly, inexpensively and effortlessly. In terms of the Act, a private body includes juristic entities such as companies.
- 1.3 In terms of section 51 of the Act, all private bodies are required to compile an information manual ('PAIA Manual') that provides information on the types and categories of records held by a public or private body and the process that must be followed when requesting information related to such records.
- 1.4 Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements, except where the Act expressly provides that the information may be adopted when requesting information from a public or private body.
- 1.5 This document serves as the information manual of Curro Holdings Limited and its subsidiaries ('Curro') as required in terms of the Act.

## 2. Curro Holdings Limited

- 2.1 Curro owns and operates schools in Southern Africa. It develops, acquires and manages schools that offers independent school education in English and Afrikaans to learners from 3 months to Grade 12.
- 2.2 Curro was established in 1998 and it is the leading for-profit independent school provider in Southern Africa. It is committed to make independent school education accessible to more learners throughout Southern Africa.
- 2.3 This PAIA Manual of Curro is available at its premises: 38 Oxford Street, Durbanville, Cape Town, 7550 as well as on its website: [www.curro.co.za](http://www.curro.co.za).

## 3. Contact details [Section 51(1)(a) of the Act]

Name of body: Curro Holdings Limited

Registration number: 1998/025801/06

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

Postal address: PO Box 2436, Durbanville, 7551

Telephone number: 021 979 1204

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

## 4. Purpose of the PAIA manual

- 4.1 The purpose of the Act is to promote the right of access to information, to foster a culture of transparency and accountability within Curro by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 4.2 In order to promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.
- 4.3 Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
  - 4.3.1 Limitations aimed at the reasonable protection of privacy; and
  - 4.3.2 Commercial confidentiality; and
  - 4.3.3 Effective, efficient and good governance; and
  - 4.3.4 In a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.
- 4.4 This PAIA Manual complies with the requirements of the guide mentioned in section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act, 4 of 2013 (POPI), that the appointed information regulator will be responsible to regulate compliance with the Act and its regulations by private and public bodies.

## 5. Information Officer

- 5.1 The head of a private body in terms of section 51(1) and (2) of the Act, fulfils the function of compiling and updating the PAIA manual.
- 5.2 The information officer appointed in terms of the Act also refers to the information officer as referred to in the POPI Act. The information officer oversees the function and responsibilities as required in terms of both PAIA and section 55 of the POPI Act after registering with the information regulator.
- 5.3 The information regulator may where it is deemed necessary, appoint a deputy information officer, as allowed for in section 17 of the Act as well as section 56 of the POPI Act. All requests for access to information in terms of the Act must be addressed to the information officer.
- 5.4 The chief executive officer of Curro has appointed the following individual as the information officer who will be responsible for dealing with requests for records and information:

Information Officer: 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: [paiainfo@curro.co.za](mailto:paiainfo@curro.co.za)

5.5 The following persons have been appointed as deputy information officers:

Mr John Bissett

Mr Louis Booyse

Mr Mark Hodgson

Mr Shaun McMurtry

Ms Natasha Mkhize

Mr Riaan Vlok

## **6. Description of guide referred to in Section 10**

6.1 A Guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

6.2 The Guide is available for inspection, inter alia, at the office of the offices of the Human Rights Commission at Braampark Forum 3, 33 Hoofd St, Braampark, Johannesburg, 2017, Gauteng, South Africa and:

Website: [www.sahrc.org.za](http://www.sahrc.org.za) .

E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

Postal address: Private Bag 2700, Houghton, Gauteng, South Africa, 2041

Telephone: +27 (0)11 877 3600

6.3 From 1 July 2021 the contact details will be for :

Information Regulator South Africa

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

## **7. Records available in accordance with other legislation [Section 51(1(c))]**

7.1 Records are kept in accordance with such other legislation as is applicable to Curro which includes, but is not limited to the following legislation:

7.1.1 Administration of Estates Act 66 of 1965

7.1.2 Basic Conditions of Employment Act 75 of 1997

7.1.3 Companies Act 71 of 2008

7.1.4 Compensation for Occupational Injuries and Diseases Act 130 of 1993

7.1.5 Competition Act 89 of 1998

7.1.6 Financial Intelligence Centre Act 36 of 2000

7.1.7 Income Tax Act 95 of 1967

7.1.8 Insolvency Act 24 of 1936

7.1.9 Labour Relations Act 66 of 1995

7.1.10 National Credit Act 34 of 2005

7.1.11 Occupational Health and Safety Act 85 of 1993

- 7.1.12 Skills Development Act 97 of 1998
- 7.1.13 South African Schools Act 84 of 1996
- 7.1.14 Trademarks Act 194 of 1993
- 7.1.15 Unemployment Contributions Act 4 of 2002
- 7.1.16 Unemployment Insurance Act 63 of 2001
- 7.1.17 Value-Added Tax Act 89 of 1991

## **8. Subjects and categories of records held [Section 51(1)(d)]**

8.1 This serves as a reference to the categories of information that Curro holds. The information is classified and grouped according to records relating to the following subjects and categories:

### 8.1.1 Human resources records

- 8.1.1.1 Personal records provided by employees of Curro
- 8.1.1.2 Salary records
- 8.1.1.3 Conditions of employment and other personnel-related contractual and quasi-legal records
- 8.1.1.4 Internal evaluation records
- 8.1.1.5 UIF records
- 8.1.1.6 PAYE records
- 8.1.1.7 Leave records
- 8.1.1.8 Training records
- 8.1.1.9 Human Resources policies and procedures

### 8.1.2 Customer-related records

- 8.1.2.1 Records provided by a customer/client
- 8.1.2.2 Records generated internally by or within Curro relating to customer/clients including transactional records
- 8.1.2.3 Contractual records

### 8.1.3 Financial records

- 8.1.3.1 Annual reports
- 8.1.3.2 Management reports
- 8.1.3.3 VAT returns
- 8.1.3.4 Income tax returns and assessments
- 8.1.3.5 Invoices
- 8.1.3.6 Receipts
- 8.1.3.7 SETA returns
- 8.1.3.8 Asset records
- 8.1.3.9 Insurance policies and claims

### 8.1.4 Company information

- 8.1.4.1 Trademarks
- 8.1.4.2 Databases
- 8.1.4.3 Information Technology
- 8.1.4.4 Marketing records
- 8.1.4.5 Internal correspondence
- 8.1.4.6 Operational records

- 8.1.4.7 Product-related records
- 8.1.4.8 Internal policies and procedures
- 8.1.4.9 Compliance records
- 8.1.4.10 Shareholder records
- 8.1.4.11 Records relating to board members
- 8.1.4.12 Minutes of meetings (including resolutions taken)
- 8.1.4.13 Company register and other statutory company records
- 8.1.4.14 Shareholding in subsidiaries
- 8.1.4.15 Contractual records and information relating to suppliers, service providers, contractors, professional advisors (such as attorneys and auditors) and financiers.

#### 8.1.5 Products and services

- 8.1.5.1 Product specifications
- 8.1.5.2 Product documentation (including application forms)

8.2 The accessibility of the records may be subject to the grounds of refusal set out in the Act. Amongst other, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before Curro will consider access.

## 9. Purpose for processing of personal information

9.1 Curro processes personal information for the following specific, explicitly define and lawful reasons:

- 9.1.1 to initiate recruitment of and the management of employees
- 9.1.2 to comply with relevant legislation governing employees
- 9.1.3 to finalise learner enrolment
- 9.1.4 to manage learner profiles and academic progress including examination and assessment
- 9.1.5 to monitor account payments of learners
- 9.1.6 to engage with parents/guardians
- 9.1.7 to engage with contractors and service providers
- 9.1.8 to support marketing activities

## 10. Data subjects categories and their personal information

10.1 The following categories of data subjects' personal information are processed by Curro:

- 10.1.1 Employees: record of employee life cycle
- 10.1.2 Learners: record of learner life cycle
- 10.1.3 Parents/guardians: record of parents/guardians life cycle
- 10.1.4 Service providers: record of service provider life cycle
- 10.1.5 General public: tracking general enquiries

## 11. Planned recipients of personal information

- 11.1 Statutory authorities
- 11.2 Law enforcement
- 11.3 Tax authorities

- 11.4 Financial institutions
- 11.5 Medical schemes
- 11.6 Employee pension and provident funds
- 11.7 Industry bodies
- 11.8 Non – Curro schools (when leaving Curro)

## **12. Planned trans-border flows of personal information**

- 12.1 Curro may transfer data trans-border in order to store data with third party cloud storage providers.

## **13. Security measures to protect personal information**

- 13.1 Curro has implemented a number of security measures to protect personal information processed by Curro as the Responsible Party in terms of the POPI Act, No 4 of 2013:
  - 13.1.1 Physical security measures
  - 13.1.2 Cyber security measures
  - 13.1.3 Training in information security
  - 13.1.4 Policies in information security
  - 13.1.5 Audits of information security

## **14. Details on how to make a request for access [Section 51(e)]**

- 14.1 The requester must complete Form C (Appendix 1) and submit this form together with a request fee, to the information officer of Curro.
- 14.2 The form must be submitted to the information officer of Curro at Curro's address, fax number, or electronic mail address as stated earlier in this manual.
- 14.3 Form of request:
  - 14.3.1 The requester must use the prescribed form, as attached in terms of Article 8 of this manual, to make the request for access to a record. This must be made to the information officer. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].
  - 14.3.2 The requester must provide sufficient detail on the request form to enable the information officer to identify the record and the requester.
  - 14.3.3 The requester should indicate which form of access is required.
  - 14.3.4 The requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].
  - 14.3.5 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2)(d)].
  - 14.3.6 If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the designated head of the private body [s 53(2)(f)]



- 14.3.7 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 14.3.8 Every other requester, who is not a personal requester, must pay the fee.
- 14.3.9 The information officer of Curro must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)].
- 14.3.10 The fee that the requester must pay to a private body is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees 54(3)(b)].
- 14.3.11 After the information officer of Curro has made a decision on the request, the requester must be notified in the required form.
- 14.3.12 If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].

## 15. Availability of the manual

This manual is available for inspection at the office of Curro free of charge.

## 16. Fees [Section 51(1(f))]

- 16.1 The requester is the person making the request for access to a record. There are two types of requesters:
  - 16.1.1 **Personal requester:** A person who requests access to his/her own personal information.
  - 16.1.2 **Other requester:** A person requesting access to information of third parties.
- 16.2 The following fees are payable when making a request for information:
  - 16.2.1 **Request fee:** Standard fee payable by other requesters, but not payable by personal requesters, payable at the time that the request is made.
  - 16.2.2 **Access fee:** Payable in all instances where a request for access is granted unless payment of the access fee is specifically excluded in terms of the Act or any regulations published pursuant to the Act. This fee is calculated by considering reproduction costs, search and preparation time and cost, as well as postal costs.
- 16.3 The information officer may require that requesters pay a deposit in respect of the access fee at the time of making the request. If the request is subsequently declined, the deposit will be refunded.
- 16.4 If a request fee and/or a deposit is payable, the information officer will not process the request until payment thereof has been made.
- 16.5 If a request for information is granted, the information officer will advise the requester of the amount of the access fee payable before the record will be released.
- 16.6 Bank account details for purposes of making payments can be obtained from the information officer and may be made by way of a direct deposit into the appropriate bank account or by way of a bank guaranteed cheque.
- 16.7 Appendix 2 hereto sets out the amounts payable in respect of the prescribed fees.

# Request for access to record of private body

(POPI Act: Form C)

**CURRO**

Curro Holdings Ltd/Reg. no. 1998/025801/06/VAT Reg. no. 4670183484

## Section 1: Particulars of private body

The Head (Information Officer):

School name

## Section 2: Particulars of person requesting access to the record

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

Name and surname													
ID number													
Postal address							Telephone number						
							Fax number						
							Cellphone number						
Email address													

Capacity in which request is made, when made on behalf of another person:

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## Section 3: 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.

Name and surname												
ID number												

## Section 4: 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.

Description of record or relevant part of the record:

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Reference number, if available:

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Any further particulars of record:

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## Section 5: Fees

- (a) A request for access to a record, other than a 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 for exemption.

Reason for exemption from payment of fees:

## Section 6: Form of access to 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 below, state your disability and indicate in which form the record is required.

Disability  Form in which record is required

Notes:

- (a) Compliance with your request for access in the specified form may depend on the form in which the record is available.
- (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.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

**Mark the appropriate box with an X:**

**If the record is in written or printed form:**

copy of record\*  inspection of record

**If record consists of visual images (videos, photographs, slides, etc.)**

view images  copy of images\*  transcription of images\*

**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)

**If record consists of visual images (videos, photographs, slides, etc.)**

printed copy of record\*  printed copy of information derived from the record\*  copy in computer readable form\* (stiffy or compact disc)

\*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable. Yes  No

## Section 7: Particulars of right to be exercised or protected

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.

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:

## Section 8: 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 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 \_\_\_\_\_ on this day \_\_\_\_\_ of \_\_\_\_\_ 20\_\_\_\_.

\_\_\_\_\_  
Signature of requester *or*  
Person on whose behalf request is made

**Appendix 2: Schedule of fees**  
**The applicable fees are as follows:**

**Reproduction fees fee**

For every photocopy of an A4 size paper of part thereof	R1,10
For every printed copy of an A4 size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
For a copy in a computer-readable form on stifty disc	R7,50
For a copy in a computer-readable form on a stifty disc compact disc	R70,00
A transcription of visual images, for an A4 size page or part thereof	R40,00
For a copy of visual images	R60,00

**Request fees (for requests on behalf on behalf of another person**

Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R50,00 is payable upfront before the institution will further process the request.	R50,00
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**Access fees fee**

For every photocopy of an A4 size paper or part thereof	R1,10
For every printed copy of an A4 size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
For a copy in a computer-readable form on stifty disc	R7,50
For a copy in a computer-readable form on a stifty disc compact disc	R70,00
A transaction of visual images, for an A4 size page or part thereof	R40,00
For a copy of visual images	R60,00
To search for a record that must be disclosed, R30,00 for every hour or part of an hour reasonably required for such search	R30,00
Where a copy of a record needs to be posted the actual postal fee is payable	

**Deposits**

Where the institution receives a request for access to information held on a person other than the requester him-/herself and the information officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester. The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.
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