

RONDEBOSCH BOYS' HIGH SCHOOL
PROMOTION OF ACCESS TO INFORMATION MANUAL



PAIA MANUAL

**Prepared in terms of section 14 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 | “RBHS” | Rondebosch Boys’ High School |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO“ | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA”
(the “Act”) | Promotion of Access to Information Act No. 2 of 2000
as
Amended; |
| 1.6 | “PFMA” | Public Finance Management Act No.1 of 1999 as
Amended; |
| 1.7 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.8 | “Regulator” | Information Regulator. |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the nature of the records which may already be available at RBHS, without the need for submitting a formal PAIA request;
- 2.2 have an understanding of how to make a request for access to a record of RBHS;
- 2.3 access all the relevant contact details of the persons who will assist the public with the records they intend to access;

- 2.4** know all the remedies available from RBHS, regarding request for access to the records, before approaching the Regulator or the Courts;
- 2.5** provide a description of the services available to members of the public from RBHS, and how to gain access to those services;
- 2.6** provide a description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.7** indicate if RBHS 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;
- 2.8** know if RBHS 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
- 2.9** know whether RBHS has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. ESTABLISHMENT OF RONDEBOSCH BOYS' HIGH SCHOOL,

3.1. Objectives/Mandate

RBHS is established, mandated and governed by the South African Schools Act 84 of 1996 and the Constitution of the Governing Body of Rondebosch Boys' High School and the relevant policies. In order to perform its functions, RBHS needs to process personal information about all persons with whom it deals and interacts with from time to time. There are various reasons why RBHS may need to process such information, such as monitoring of performance, achievements, health and safety of learners, employees or other stakeholders. RBHS may also be obligated by Law or governing bodies to process such information for reporting, statistical or other purposes.

4. STRUCTURE OF RONDEBOSCH BOYS' HIGH SCHOOL AND FUNCTIONS

4.1. Structure

RBHS is a public school and thus reports to the Western Cape Education Department.

At the head of RBHS is the Principal, who is assisted by a Senior Management Team (an Academic Deputy, a Pastoral Deputy and a Deputy in charge of Sport).

There are also a number of Heads of Department (HODs), each with a specific area of responsibility such as Academic; Civic & Social Responsibility (including Diversity and Transformation); Professional Development; Cultural; Leadership; Estates (including maintenance, safety and security).

The administrative staff include a Business Manager who oversees the financial matters of the School, including fees. There is a Marketing

Department; a School Librarian; an IT Innovation and Operations Manager; and three secretarial staff who fill the roles of PA to the Principal, the data administrator and the receptionist. While these three roles overlap to a degree, each person is responsible for the designated functions. An Estates Manager is responsible for managing the school's grounds and day-to-day maintenance of the buildings.

The School caters for approximately 140 boarders who are accommodated in two hostels. There is a Hostel Superintendent who is in overall charge of all hostel matters. To assist him there is a Hostel Master in charge of each hostel, together with a number of assistant masters (generally speaking all are employed on the RBHS teaching staff). The support staff (kitchen, laundry) are supervised by a Catering Manager and a Hostel Manager.

The School Governing Body (SGB) works closely with the School Management on all governance matters. The Chairman of the Hostel Management Committee is also a member of the SGB. Parents, Educators and Non-Educators are all represented on the Board and an election is held every three years in accordance with the Departmental regulations. In addition, two senior learners are Board members but only for 12 months, commencing in September each year. These learners are usually also Executive Council members.

Student leadership opportunities are many; the Executive Council (formerly known as Prefects) consist of about 18 Grade 12s and the Representative Council of Learners which usually comprises three representatives from each grade. These two bodies head up various school portfolios responsible for diverse areas which reflect those under the aegis of the HODs.

RBHS has adopted what is known as "The Vertical House System". This System allows each pupil to be allocated a tutor class with approximately 4 to 5 boys from each of the other grades. This system was implemented to bring a balance in terms of age, academic and other abilities, ethnicity and interests. It further sets out to create new friendship groups between different

backgrounds and age groups and serves as a safe space to discuss important leadership and pastoral matters. All grade 8 and 9 pupils are allocated a senior student mentor within his tutor group.

The aforementioned system places a special responsibility on senior members of staff and their teams. It is their responsibility to ensure that all boys receive recognition for their actions and become fully integrated members of the school community. Currently (and as per the system), The House Director oversees all aspects in the running of the house and is tasked with monitoring the Grade 12 group in his/her house. Each House Director has two Assistant House Directors. The one Director is tasked with overseeing the Grade 10 and 11 boys and the other, the grade 8 and 9 boys. Together, they control all administrative, disciplinary and pastoral matters in the house.

The Pastoral Deputy and School Counsellor meet (at least once a week) with the House Directors and they, in turn, meet with their respective Assistance House Directors. A tutor teacher will manage tutor groups. Tutor teachers report directly to Assistant House Directors.

4.2 Functions

The Board of Governors (Board) places ethical behaviour and good governance at the centre of its culture. The core functions of the school are considered fundamental components of ensuring the long-term sustainability of Rondebosch Boys' High School (RBHS). These core functions include delivering the curriculum within the framework as laid down by the national Department of Basic Education, with the aim of producing well-equipped learners able to take their places in the world after school. To this end, the school's academic approach includes offering those learning areas best suited for applications to a variety of courses at tertiary institutions, and a number of enrichment opportunities for participation in Olympiads and other national competitions. The school also offers several sports (summer and

winter) and boasts a thriving, well-known music department which gives budding musicians opportunities to join bands and ensembles.

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF RONDEBOSCH BOYS' HIGH SCHOOL

5.1. Chief Information Officer

Name: Shaun Hendrick Simpson
Tel: 021 686 3987
Email: theheadmaster@rondebosch.com

5.2. Deputy Information Officer/s

Name: Shaukat Ebrahim
Tel: 021 681 7923
Email: shaukat.ebrahim@rondebosch.com

5.2.1. Name: Neil Teubes
Tel: 021 681 7943
Email: neil.teubes@rondebosch.com

5.2.2. Name: Gustaf Pienaar
Tel: 021 681 7922
Email: gustaf.pienaar@rondebosch.com

5.3 Access to information general contacts

Email: privacy@rondebosch.com

5.4 School Office

Postal Address: Canigou Avenue, Rondebosch, 7700

Physical Address: Canigou Avenue, Rondebosch, 7700

Telephone: 021 686 3987

Email: info@rondebosch.com

Website: www.rondebosch.com

6. DESCRIPTION OF ALL REMEDIES AVAILABLE IN RESPECT OF AN ACT OR A FAILURE TO ACT BY RONDEBOSCH BOYS' HIGH SCHOOL

6.1. Internal Remedies

6.1.1. RBHS is required to have any internal appeal procedures. Any decision made by the Information Officer/s of RBHS is considered final. Requestors do however, have the right to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer/s of RBHS.

6.2. External Remedies

6.2.1. A requestor that is dissatisfied with the information Officer/s refusal to disclose information may within 30 (thirty) days of notification of the decision, apply to an appropriate Court for relief.

6.2.2. A third party dissatisfied with the Information Officer/s decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to an appropriate Court for relief.

6.2.3. For purposes of the POPI Act, the Courts that have jurisdiction over the application are the Constitutional Court, the High Court or another Court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

7. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

7.1. The Regulator has, in terms of section 10(1) of PAIA, 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.

7.2. The Guide is available in English and in other official languages upon request.

7.3. The aforesaid Guide contains the description of-

7.3.1. the objects of PAIA and POPIA;

7.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

7.3.2.1. the Information Officer of every public body, and

7.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

7.3.3. the manner and form of a request for-

7.3.3.1. access to a record of a public body contemplated in section 11³; and

7.3.3.2. access to a record of a private body contemplated in section 50⁴;

7.3.4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

7.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

7.3.6. 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-

7.3.6.1. an internal appeal;

7.3.6.2. 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.*

- 7.3.6.3.** 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;
- 7.3.7.** 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;
- 7.3.8.** the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 7.3.9.** the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 7.3.10.** 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.”

7.4. Members of the public can inspect or make copies of the Guide from the offices of the public or private bodies, including the office of the Regulator, during normal working hours. The Guide can also be obtained-

7.4.1. upon request to the Information Officer;

7.4.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD BY RONDEBOSCH BOYS' HIGH SCHOOL

8.1. **Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA manual. 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 Rondebosch Boys' High School will consider access.**

Subjects on which the body holds records	Categories of records held on each subject
Governance and legal records	<ul style="list-style-type: none"> - Constitution of SGB - Property title deeds; - Names of Board of Governors, Trustees, Sub-committee members, Task team members, Directors; - Policies; - Minutes of meetings of the Board of Governors; - Minutes of meetings of Committees; - Annual General meeting minutes and Special resolutions passed at Annual General meetings;

	<ul style="list-style-type: none"> - Records relating to the appointment of: - Auditors; - Leases; - Agreements; - Contracts with service providers; - Registration documents for PBO, NPO, Western Cape Education Department; - Legal and statutory records.
Financial Records	<ul style="list-style-type: none"> - Annual audited financial statements - Quarterly management accounts - Invoices - Credit Notes - Receipts - Payment schedules - PAYE, SDL, UIF reports - Insurance policies and claims - Petty cash records - School fees - Applications for exemption from payment of school fees - Software licences - Assets register
Income Tax Records	<ul style="list-style-type: none"> - PAYE Records; - Documents issued to employees for income tax purposes; Records of payments made to SARS on behalf of employees; All other statutory compliances: - VAT; - Skills Development Levies; - UIF; - Workmen's Compensation.
Personnel Documents And Records	<ul style="list-style-type: none"> - Accident books and records; Address Lists; - Disciplinary Code and Records; - Employee benefits arrangements rules and records; - Pre-Employment data and Employment Contracts; - Employment Equity Plan; - Forms and Applications; - Grievance Procedures; - Leave Records; - Medical Aid Records; - Payroll reports/ Wage register; - Pension Fund Records; - Safety, Health and Environmental records; - Salary Records; - SETA records;

	<ul style="list-style-type: none"> - Registration records for SACE; - Standard letters and notices; - Training Manuals; - Training Records; - Workplace and Union agreements and records.
Learners' academic and extra-curricular records, disciplinary records	<ul style="list-style-type: none"> - Termly progress report - Annual promotion schedules - Copies of statements of results - Academic awards - Sports awards - Culture awards - Other awards - Learners' personal files (profiles)
Procurement Department	<ul style="list-style-type: none"> - Standard Terms and Conditions for supply of services and products; - Contractor, client and supplier agreements; - Lists of suppliers, products, services and distribution; - Policies and Procedures.
Admissions Department	<ul style="list-style-type: none"> - Parent and pupil details; - Credit application information; - Information and records provided by a third party; - Financial Assistance forms for Bursary information.
Health & Safety	<ul style="list-style-type: none"> - Safety committee members' details - Incident register - Accident register - Safety committee quarterly meeting minutes - Safety reports
ITC Records	<ul style="list-style-type: none"> - Computer / mobile device usage policy documentation; - Disaster recovery plans; - Hardware asset registers; - Information security policies/standards/procedures; - Information technology systems and user manuals Information usage policy documentation; - Project implementation plans; - Software licensing; - System documentation and manuals.
Professional Management	<ul style="list-style-type: none"> - Particulars and instructions from Western Cape Education Department - Official school logbook - Copies of all examination question papers and accompanying memoranda

	<ul style="list-style-type: none"> - School timetable - Class registers
News	<ul style="list-style-type: none"> - Newsletters - Special letters to parents - Engage school admin system - School magazine

9. CATEGORIES OF RECORDS OF RONDEBOSCH BOYS' HIGH SCHOOL WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

9.1. Records of a public nature, typically those that are disclosed on RBHS website www.rondebosch.com and in its various annual reports, may be accessed without the need to submit a formal application.

9.2. Other non-confidential records, such as statutory records maintained, may also be accessed without the need to submit a formal application, however, it is to be noted that an appointment to view such records will still need to be made with the Information Officer or his Deputies.

10. PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of Processing

RBHS processes personal information in order:

-  To support learner enrolments and marketing activities;
-  To support recruitment and management of staff;
-  To support engagement with 3rd party service providers/suppliers;
-  To support engagement with the general public and Governmental Departments;
-  To support engagement with donors, investors and the media.

10.2 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
Employees	Name and contacts details; ID number and identity documents (including passports); Employment history and references; Banking Details; Details of payments to 3 rd parties (deductions from salary); Employment contracts; Employment equity plans; Medical aid and medical records; Pension fund records; Salary records; Performance appraisals; Disciplinary records; Leave records and training records.
Data Subjects and prospective data subjects	Postal/street address; Title and name; Contact number and/or email address; Ethnic group; Employment history; Age; Gender; Martial status; Nationality; Language; Financial information; Identity or passport number; Browsing habits and click patterns on RBHS website.
Vendors/suppliers and or other businesses	Name and contact details; Identity and/or company and directors' information; Banking and financial information; Information about products or services; Other information not specified, reasonably required to be processed for business operations.

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

- ✚ **Any firm, organisation or consultancy** that RBHS may use to collect payments and recover debts or to provide a legal service on its behalf.

- ✚ **Any firm, organisation or consultancy** that may/who provides RBHS with products, services or benefits;
- ✚ **Any payment system or program** that RBHS uses;
- ✚ **Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities,** where RBHS has a duty to share information;
- ✚ **Third parties** to whom payments are made on behalf of employees;
- ✚ **Financial institutions** from whom payments are received on behalf of data subjects;
- ✚ **Any other operator** not specified;
- ✚ **Employees, contractors and temporary staff;** and
- ✚ **Agents.**

10.4 Planned transborder flows of personal information

Personal Data/Information may at times be transmitted (transborder) to RBHS' suppliers in other countries, and Personal Data/Information may be stored in data servers hosted outside RSA (these countries may not always have adequate data protection laws). RBHS will however, always endeavour to ensure that reasonable efforts are in place to secure the aforementioned data/personal information.

RBHS may, at selected times, need to transmit your Personal Data/Info to a location outside the location of the RSA (where third parties may process it). This may arise in a situation where we are attempting to communicate with you or your child whilst you are in another country.

Furthermore, RBHS may also deem it necessary to have our backup infrastructure located in, or administrated from another country. It is to be borne in mind that in such a case, the transmission and processing of such information is subject to the provisions of Section 72 of POPIA (the third party to which we may transmit your information will, be subject to either laws or a Data Processing Agreement with RBHS). The purpose of such an agreement is to ensure that they apply the same reasonable safeguards in respect of your Personal Information, as RBHS have been required to do.

10.5 General Description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.

As required by section 19 of the POPI Act, the confidentiality and integrity of any Personal Data/Info as processed by RBHS (hereinafter referred to as the “Responsible Party”) is subject to reasonable technical and organisational safeguards in order to prevent loss, damage, destruction or unauthorised access. We will notify you (the Data Subject) and the Information Regulator, should we suspect that a data breach has occurred.

RBHS undertakes to institute and maintain data protection measures to accomplish the following objectives outlined below.

The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. RBHS may elect use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

Access Control of Persons

RBHS shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

Data Media Control

RBHS undertakes to implement suitable measures to prevent the unauthorized

manipulation of media, including reading, copying, alteration or removal of the data media used by RBHS and containing personal data of Data Subjects.

Data Memory Control

RBHS undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorised reading, alteration or deletion of stored data.

User Control

RBHS shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

Access Control to Data

RBHS represents that the persons entitled to use RBHS' data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions.

Transport Control

RBHS shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

Organisation Control

RBHS shall maintain its internal organisation in a manner that meets the requirements of this Manual.

11. AVAILABILITY OF THE MANUAL

11.1 This Manual is currently available in English. It can however, be made available in both Afrikaans and isiXhosa upon request.

11.2 A copy of this Manual or the updated version thereof, is also available as follows-

11.2.1 on www.rondebosch.com;

11.2.2 at the school office for public inspection during normal business hours;

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

11.2.4 to the Information Regulator upon request.

11.3 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.

12. UPDATING OF THE MANUAL

Rondebosch Boys' High School will, if necessary, update and publish this Manual annually.

Issued by

Shaun Hendrick Simpson
Headmaster & Chief Information Officer