



PUBLIC ACCESS TO INFORMATION MANUAL

**PREPARED IN TERMS OF SECTION 51 OF
THE PROMOTION OF ACCESS TO INFORMATION ACT, No. 2 of 2000
("the Act")**

For

**PRAXIS EDUCATION (PTY) LTD
t/a Praxis Education**

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1. INTRODUCTION & PURPOSE OF THIS DOCUMENT

The Promotion of Access to Information Act 2 of 2000 (“the Act”) gives effect to the right of access to information in records held by public or private bodies that is required for the exercise or protection of any rights as enshrined in the Bill of Rights forming part of The Constitution of The Republic of South Africa, 1996 (“the Constitution”).

This Promotion of Access to Information Manual (“PAIA Manual”) provides an outline of the type of records and the personal information it holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA ”). In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

The PAIA and POPIA Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

2. CONTACT DETAILS AND GENERAL INFORMATION

2.1. Availability of this PAIA Manual

A copy of this manual can be requested from the Information Officer (see contact details in section 2.4).

2.2. Guidelines to the PAIA and POPIA

Guides to the PAIA and POPIA Acts can be obtained and queries directed to:

PAIA	POPIA
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041	Information Regulator P.O. Box 31533 Braamfontein Johannesburg 2017
Braampark, Forum 3 33 Hoofd Street Braamfontein Johannesburg 2001	JD House 27 Stiemens Street Braamfontein Johannesburg 2001
Telephone number: (011) 484 8300 Fax number: (011) 484 7146/7 Website : www.sahrc.org.za E-mail : PAIA@sahrc.org.za	Website: www.justice.gov.za/inforeg E-Mail: inforeg@justice.gov.za

2.3. Company Details

Praxis Education	
Postal Address	PO Box 2980 Krugersdorp 1740
Street Address	73 Lawrence Road Poortview Roodepoort
Telephone number	+ 27 11 660 7584
Facsimile number	+ 27 86 601 4138
Electronic Mail Address	info@praxisonline.co.za
Website	www.praxis.schools.com

2.4. Company Contact Details

Group Information Officer	Ann-louise van Wyk
Electronic Mail Address	a.vanwyk@almacambridge.org.za
Deputy Information Officer for Praxis Education	Marie van Wyk
Electronic Mail Address	admissions@praxisonline.co.za
Telephone number	+ 27 11 660 7584
Facsimile number	+ 27 86 601 4138

3. COMPANY RECORDS

3.1. Records available in accordance with other legislation

The company has records available in terms of various laws, as amended, including:

- Labour Relations Act 66 of 1995;
- Employment Equity Act 55 of 1998;
- Basic Conditions of Employment Act 75 of 1997;
- Compensation of Occupational Injuries and Diseases Act 130 of 1993;
- Companies Act 71 of 2008;
- Unemployment Insurance Act 63 of 2001;
- Value Added Tax Act 89 of 1991;
- Income Tax Act 58 of 1962;

- Skills Development Act 9 of 1999;
- Stock Exchanges Control Act 1 of 1985 and the Rules and Listing Requirements of the JSE Securities Exchange issued in terms thereof;
- South African Schools Act 84 of 1996;
- Gauteng School Education Act 6 of 1995
- Further Education and Training Colleges Act 16 of 2006;
- Higher Education Act 101 of 1997;
- Protection of Personal Information Act 4 of 2013.

3.2. Summary: records available

DEPARTMENTAL RECORDS	SUBJECT
Finance	Audited Financial Statements
	Tax Records – Company and employees
	Asset Register
	Management Accounts
Human Resources	Employee Records
	Employee Contracts
Legal	Admission Agreements
	General contract documentation
	Company guidelines, policies and procedures
	Statutory and Environmental Records
Marketing	Market Information
	Brochures
	Media Releases
Other	Parent / Guardian Information and database
	Student Information and database

4. PRAXIS EDUCATION PRIVACY PRACTICES

4.1. Personal Information that we collect about you:

- 4.1.1. Identity Data;
- 4.1.2. Contact Data;
- 4.1.3. Financial Data;
- 4.1.4. Medical data;
- 4.1.5. Student performance data;
- 4.1.6. Transaction Data;
- 4.1.7. Service Data;
- 4.1.8. Technical Data;
- 4.1.9. Usage Data;
- 4.1.10. Marketing and Communications Data;

4.2. We collect personal or other information to:

- 4.2.1. provide our services to you, as well as any services that you may purchase from us (including goods you purchase from our website);
- 4.2.2. Administer our various education programs;
- 4.2.3. Operate our facilities;
- 4.2.4. Comply with our statutory obligations, including submissions to the Companies and Intellectual Property Commission, as well as interacting with regulatory authorities;
- 4.2.5. Conduct business case analysis;
- 4.2.6. Conduct Praxis Education's recruitment exercises, including referrals, and hiring processes, including the capturing of a job applicant's details and the providing of status updates to such a job applicant. In this context Praxis Education will conduct criminal record and credit checks;
- 4.2.7. Retain and make information available to you on the website;
- 4.2.8. Provide you with marketing that is relevant to you, or to direct information concerning Praxis Education to you;
- 4.2.9. Maintain and update our customer or potential customer databases;
- 4.2.10. Establish and verify your identity on our website;
- 4.2.11. Diagnose and deal with technical issues and customer support queries and other use queries;
- 4.2.12. Operate, administer, maintain, secure, and develop the website and the performance and functionality of our website;
- 4.2.13. Protect our rights in any litigation that may involve you;
- 4.2.14. Detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorized use of our Website and/or contravention of our Privacy Notice or of the terms and conditions that apply to your use of our website;
- 4.2.15. Communicate with you and keep a record of our communications with you and your communications with us;
- 4.2.16. Inform you about changes to our website, Privacy Notice or other changes that are relevant to you;
- 4.2.17. To create user profiles and analyse and compare how you and other users make use of the website, including (without limitation) habits, click-patterns, preferences, frequency and times of use, trends and demographics;
- 4.2.18. To analyse and compare the kinds of access devices that you and others make use of and where you are using them; and
- 4.2.19. For other purposes relevant to our business activities, provided they are lawful.

4.3. Security Measures to protect personal information

- 4.3.1. Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Praxis Education and its operators. In terms of POPIA, operators are third parties that process personal information on behalf of the School.

- 4.3.2. We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

4.4. Trans-border flows of personal information

- 4.4.1. We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so:
- (i) Only in accordance with South African legislative requirements; or
 - (ii) If the data subject consents to transfer of their personal information to third parties in foreign countries.
- 4.4.2. We 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.
- 4.4.3. We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 4.3.
- 4.4.4. Personal information shared for performance of the pre-admission test, done by an external party outside the borders of South Africa, will be limited to the information required to do the test. The safeguards listed in 4.4.1 will be adhered to at all times.

5. ACCESS TO RECORDS

5.1. Automatic disclosures

The following information is freely available:

- Praxis Education (Pty) Ltd Annual Report.

5.2. Records that may be requested

The following records of Praxis Education may be available upon request:

- Companies Act records;
- Financial records;
- Tax records;
- Asset records;
- Income and other tax records;
- Student records;
- Parent/Guardian records;
- Employment records;
- Employment policies;
- Information technology records;
- Procurement records;
- Health, safety and environmental management records; and
- Other party records.

Note that recording a category or subject matter in this manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis on their own merits, and Praxis Education reserves the right to decline access to records in accordance with the provisions of the Act.

5.3. Request procedures

Any person wishing to gain access to information (“the requestor”) must submit the prescribed form (see Annexure A) to the Information Officer.

5.3.1. The requestor must:

- Provide sufficient detail on the request form to enable the Information Officer to identify the record and the requestor; and
- Indicate in which form of access is required; and
- Specify a postal address or fax number within South Africa; and
- Identify the right that the requestor is seeking to exercise or protect, and provide reasons why the requested record is required for the exercise of the access or protection.

5.3.2. If a request is made on behalf of another person, the requestor must submit proof of the capacity in which the requestor is making the request to the satisfaction of the Information Officer.

5.3.3. The Information Officer will decide whether to grant the request or to decline the request and must notify the requestor in the required form.

5.3.4. If the request is granted, the access fee (see section 6), including any time that has exceeded the prescribed hours to search and prepare the record, must be paid.

5.3.5. If, after reasonable steps have been taken to find a record requested, and same cannot be located or does not appear to exist, Praxis Education will advise the requestor accordingly.

6. FEES

6.1. Fees

6.1.1. The Act provides for 2 kinds of fees:

- Request fees – non-refundable administration fees paid by all requestors (except personal requestors); and
- Access fee – paid by all requestors only when access is granted. The fee is intended to reimburse Praxis Education for the costs involved in searching for a record and preparing it for delivery to the requestor.

6.1.2. Praxis Education may withhold the record until the request fee and the deposit (if applicable) have been paid.

6.1.3. A requestor who seeks access to a record containing personal information about that requestor (“personal requestor”) is not required to pay the request fee.

6.1.4. The fees payable are as per the Fees schedule in Annexure B.

6.2. Deposit

- 6.2.1. In accordance with section 54(2) of the Act, Praxis Education may require a deposit in cases where searching for a record exceeds 6 hours.
- 6.2.2. The deposit will represent one third of the access fees payable by the requestor.

7. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

The information contained in this section is a summary of the grounds upon which Praxis Education is entitled to raise, as grounds for the refusal of access to its records. The information is intended to provide a requestor with clarity as to the reasons why a request may be refused.

See Annexure C for details

8. RIGHT OF APPEAL

A requestor that is dissatisfied with the Information Officer's refusal to grant access to any information may –

- a) Within 30 days of being informed that the request was not granted, lodge an internal appeal; or
- b) Within 30 days of notification of the decision apply to court for relief.

9. AVAILABILITY OF THE MANUAL

Praxis Education's manual is available for inspection free of charge at the registered address as set out in the contact details at 2 above. Furthermore, a copy is available from the SAHRC (see contact details in 2 above) and on Praxis Education's website as set out in 2 above.

10. UPDATES TO THIS MANUAL

This manual will be updated whenever we make material changes to the current information.

11. PRESCRIBED FORMS

See Annexure A attached.

ANNEXURE A: PRESCRIBED REQUEST FORM

FORM C – REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act 2 of 2000 – Regulation 10)

A. Particulars of organisation required from:

The Information Officer: Ann-louise Moir

B. 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.

Full names and surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
E-mail address:	
Capacity in which request is made, when made on behalf of another person:	

C. 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.

Full names and surname:	
Identity number:	

D. 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.
- (c) The requestor must sign all the additional folios.

Description of record or relevant part of the record:	
Reference number, if available:	
Any further particulars of record:	

E. 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:

F. 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 hereunder, state your disability and indicate in which form the record is required.

<p>Disability: Form in which record is required: Mark the appropriate box with an X.</p>		
<p>NOTES: (a) Compliance with your request 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 for the record, if any, will be determined partly by the form in which access is requested.</p>		
<p>1. If the record is in written or printed form:</p>		
<input type="checkbox"/> Copy of record*	<input type="checkbox"/> Inspection of record	
<p>2. If record consists of visual images: (This includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</p>		
<input type="checkbox"/> View the images	<input type="checkbox"/> Copy of the images*	<input type="checkbox"/> Transcription of the images*
<p>3. If record consists of recorded words or information which can be reproduced in sound:</p>		
<input type="checkbox"/> Listen to the soundtrack Audio cassette	<input type="checkbox"/> Transcription of soundtrack* written or printed document	
<p>4. If record is held on computer or in an electronic or machine-readable form:</p>		
<input type="checkbox"/> Printed copy of record	<input type="checkbox"/> Printed copy of information derived from the record	<input type="checkbox"/> Copy in computer readable form*
<p>* 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.</p>		<input type="checkbox"/> YES <input type="checkbox"/> NO

G. 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 requestor 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 said right:

H. 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..... this..... day of20....

SIGNATURE OF REQUESTOR / PERSON ON WHOSE BEHALF REQUEST IS MADE

ANNEXURE B: FEES PAYABLE

1)	Request Fee		R 50.00		
2)	PAIA Manual	For every photocopy of an A4 page or part thereof.	R 1.10		
3)	Reproduction Fees	(a)	For every photocopy of an A4 page or part thereof	R 1.10	
		(b)	For every printed copy of an A4 page or part thereof held on a computer or in electronic or machine-readable form	R 0.75	
		(c)	For a copy in a computer readable form on -		
			(i)	Stiffy disc	R 7.50
			(ii)	Compact disc (disk and electronic copy for e-mailing purpose)	R 70.00
		(d)	(i)	For transcription of visual images, for an A4 page or part thereof	R 40.00
			(ii)	For a copy of visual images	R 60.00
		(e)	(i)	For a transcription of an audio record, for an A4 page or part thereof	R 20.00
(ii)	For a copy of an audio record		R 30.00		
(f)	Copy of school report (full colour)		R 200.00		
4)	Access Fees	(a)	For every photocopy of an A4-size page or part thereof	R 1.10	
		(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R 0.75	
		(c)	For a copy in a computer-readable form on -		
			(i)	stiffy disc	R 7.50
			(ii)	compact disc (disk and electronic copy for e-mailing purpose)	R 70.00
		(d)	(i)	For a transcription of visual images, for an A4-size page or part thereof	R 40.00
			(ii)	For a copy of visual images	R 60.00
		(e)	(i)	For a transcription of an audio record, for an A4-size page or part thereof	R 20.00
(ii)	For a copy of an audio record		R 30.00		
5)	Search and Preparation	To search for and prepare a record for disclosure, for each hour or part thereof reasonably required for such search and preparation	R 30.00		
6)	Actual postage is payable when a record must be posted to a requestor.				

ANNEXURE C: GROUNDS FOR REFUSAL OF ACCESS TO RECORDS**A. Section 63: Mandatory protection of privacy of a third party who is a natural person**

The head of a private body must refuse a request for access to a record of that body if its disclosure would involve the unreasonable disclosure of personal information about a third party, including a deceased individual. **However, a record may not be refused if it consists of information:**

- a) About an individual who has consented in writing to the disclosure of the information;
- b) Already publicly available;
- c) Given to the private body by the individual to whom it relates, and that individual was informed by the private body before it is disclosed that the information belongs to a class of information that may already be publicly available;
- d) About an individual's physical or mental health, or well-being, who is under the care of the requestor, and who is under the age of 18 years or incapable of understanding the nature of the request, and further if the disclosure would be in the individual's best interests;
- e) About an individual who is deceased and the requestor is the individual's next of kin, or is making the request with the written consent of the individual's next of kin;
- f) About an individual who is or was an official of a private body, and the information relates to the position or functions of the individual.

B. Section 64: Mandatory protection of commercial information of a third party

- a) The head of a private body must refuse a request for access to a record of that private body if it contains:
 - (i) Trade secrets of a third party;
 - (ii) Financial, commercial, scientific or technical information of a third party, other than trade secrets, where the disclosure thereof would be likely to cause harm to the commercial or financial interests of that third party;
 - (iii) Information supplied to the third party in confidence, and if disclosed would place the third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- b) **However, a record may not be refused if it consists of information:**
 - (i) About a third party who has already consented in writing, to its disclosure to the requestor;
 - (ii) About the results of any product or environmental testing or other investigation supplied by the private body or the results of any such testing or investigation carried out on by or on behalf of the private body and its disclosure would reveal a serious public safety or environmental risk.

C. Section 65: Mandatory protection of certain confidential information of a third party

The head of a private body must refuse a request for access to a record of that body, if its disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

D. Section 66: Mandatory protection of safety of individuals, and protection of property

- a) The head of a private body must refuse a request for access to a record of that body if its disclosure could reasonably be expected to endanger the life or physical safety of an individual.
- b) The head of a private body may refuse a request for access to a record of that body if its disclosure would be likely to prejudice or impair:
 - (i) The security of a building, structure, or system, including a computer or communication system; a means of transport or any other property;
 - (ii) The methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme; the safety of the public or part of the public or the security of a building, structure, or system, including a computer or communication system, a means of transport or any other property.

E. Section 67: Mandatory protection of records privileged from production in legal Proceedings

The head of a private body must refuse a request for access to a record of that body, if the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived such privilege.

F. Section 68: Commercial information of a private body

- a) The head of a private body may refuse a request for access to a record of that body if the record:
 - (i) Contains trade secrets of the private body;
 - (ii) Contains financial, commercial, scientific or technical information, other than trade secrets of the private body, and the disclosure thereof would likely cause harm to the commercial or financial interests of that body;
 - (iii) Contains information, the disclosure of which could reasonably be expected to put the private body at a disadvantage in contractual or other negotiations; or prejudice the body in commercial competition;
 - (iv) Is a computer programme as defined in the Copyright Act, No. 98 of 1978, which is owned by the private body, unless it is required to give access to a record in terms of PAIA.

- b) **However, a record may not be refused if it consists of information:**
About the results of any product or environmental testing or investigation (excluding the results of preliminary testing or investigations conducted for developing methods of testing), carried out by or for the public body, and the disclosure thereof would reveal a serious public safety or environmental risk.

G. Section 69: Mandatory protection of research information of a third party, and protection of research information of a private body

- a) The head of a private body must refuse a request for access to a record of that body, if the record contains information about research being carried out or to be carried out, by or on behalf of a third party, and if this were to be disclosed, it would be likely to:
 - (i) Expose the third party, or
 - (ii) the person carrying out the research or will be carrying out the research on behalf of the third party, or
 - (iii) the subject matter of the research, to a serious disadvantage.
- b) The head of a private body may refuse a request for access to a record of that body, if the record contains information about research being carried out or about to be carried out, by or on behalf of the private body, and if this were to be disclosed it would likely to expose:
 - (i) the private body or
 - (ii) the person carrying out the research or will be carrying out the research on behalf of the private body, or
 - (iii) the subject matter of the research to a serious disadvantage.

H. Section 70: Mandatory disclosure in the public interest

- a) Despite the above listed grounds for refusal, the head of a private body must grant a request for access to a record of that body if, the disclosure thereof would reveal evidence of:
 - (i) A substantial contravention of, or failure to comply with the law; or
 - (ii) An imminent and serious public safety or environmental risk; and
- b) the public interest in the disclosure of the record, outweighs the harm contemplated under the ground for refusal