PAIA Manual – Rand Preparatory and College NPC

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) and the Protection of Personal Information Act 4 of 2013.

Item	Detail
Private body	Rand Preparatory and College NPC ("Rand Schools", "the School")
Company registration no.	2005/040245/08
NPO registration no.	138-135 NPO
Manual version	1.0
Date compiled	27 October 2026
Approved by	Mr B A Harris, Executive Headmaster and CEO
Next review	October 2027, or sooner if the School's information practices change

List of acronyms and definitions

Term	Meaning
CEO	Chief Executive Officer and Executive Headmaster of the School
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Constitutional Development
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
Learner	Any child enrolled at Rand Preparatory or Rand College
Parent	A parent, legal guardian or other person responsible for a learner's fees or care

1. Introduction and purpose of this manual

Rand Preparatory and College NPC is a private body under PAIA: an independent, IEB-affiliated school registered as a non-profit company. Section 51 of PAIA requires the head of every private body to compile, publish and update a manual describing the records it holds and how to request them.

This manual helps any person to:

- check which categories of records the School holds, and which are available without a formal request;
- understand how to request access to a record, and the fees that apply;
- know whom to contact at the School, and how to complain to the Regulator;
- understand how the School processes personal information, as POPIA requires.

Publishing this manual does not give anyone an automatic right to a record. Every request is assessed against PAIA, including its grounds for refusal.

2. Particulars of the School and key contact details (section 51(1)(a))

All PAIA and POPIA requests go to the Information Officer. Under PAIA the head of a private body is its Information Officer; the Executive Headmaster and CEO holds that role.

Contact	Details
Information Officer	Mr B A Harris, Executive Headmaster and CEO
Deputy Information Officer	Mrs Wendy Harris
Physical address	74 Sixth Avenue, Bezuidenhout Valley, Johannesburg
Postal address	74 Sixth Avenue, Bezuidenhout Valley, Johannesburg (same as physical address)
Telephone	(011) 618-3331/2
Fax	(011) 624-2420
General email	info@randschools.co.za
PAIA / POPIA email	paia@randschools.co.za
Website	www.randschools.co.za

Requests may be delivered by hand during school office hours, posted or emailed. Please mark them "PAIA Request" in the subject line.

The Information Officer and any Deputy Information Officer must be registered with the Regulator through its eServices portal.

3. Guide on how to use PAIA (section 51(1)(b)(i))

The Regulator has published a Guide, under section 10 of PAIA, explaining how to exercise the rights in PAIA and POPIA. It is available free of charge in each official language.

The Guide covers, among other things:

- the objects of PAIA and POPIA;
- contact details of Information Officers and Deputy Information Officers;
- how to request access to a record of a private body under section 50;
- the help available from the Regulator;
- remedies, including complaints to the Regulator and court applications;
- the prescribed fees and forms.

Copies of the Guide may be:

- downloaded from the Regulator's PAIA resources page;
- inspected at the School's office during school office hours, or requested from the Information Officer.

Information Regulator	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200
Toll free	0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

4. Records available without a request (section 51(1)(b)(ii) and section 52)

The School has not published a notice under section 52(2) of PAIA. The records below are, however, freely available without a formal PAIA request.

Category of record	Where available
General information about the School, its ethos and its staff leadership	Website; school office
Admission information and application forms	Website; school office
Fee schedules for the current year	On request from the school office

Category of record	Where available
Parent newsletters and circulars	Issued to parents; website where published
School calendar and term dates	Website; parent communications
Code of conduct, uniform policy and other parent-facing policies	Issued to parents; school office
Privacy notice / POPIA notice	Website; school office
This PAIA manual	Website; school office

Records that are publicly available may still attract reproduction fees where hard copies are requested.

5. Records kept in terms of other legislation (section 51(1)(b)(iii))

The School keeps records as required by the laws below. Where a law gives a right of access, that law applies; otherwise a PAIA request is needed. This list is not exhaustive.

Legislation	Typical records
South African Schools Act 84 of 1996	Independent school registration, admission and learner records
Gauteng School Education Act 6 of 1995	Registration and compliance records with the Gauteng Department of Education
Children's Act 38 of 2005	Child Protection Register checks for staff
Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007	National Register for Sex Offenders checks for staff
South African Council for Educators Act 31 of 2000	Educator SACE registration records
Companies Act 71 of 2008	Memorandum of Incorporation, director and statutory records
Nonprofit Organisations Act 71 of 1997	NPO registration and annual reports
Income Tax Act 58 of 1962	Tax, PAYE and public benefit organisation records
Tax Administration Act 28 of 2011	Records supporting tax returns
Value-Added Tax Act 89 of 1991	VAT records, where applicable
Basic Conditions of Employment Act 75 of 1997	Employment contracts, leave, time and remuneration records
Labour Relations Act 66 of 1995	Disciplinary, grievance and dispute records

Legislation	Typical records
Employment Equity Act 55 of 1998	Employment equity plans and reports
Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999	Training and levy records
Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002	UIF records
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Injury-on-duty records
Occupational Health and Safety Act 85 of 1993	Health and safety, incident and evacuation records
Consumer Protection Act 68 of 2008	Parent contracts and fee agreements
Electronic Communications and Transactions Act 25 of 2002	Electronic records and communications
Protection of Personal Information Act 4 of 2013	Personal information records, consents and breach records
Promotion of Access to Information Act 2 of 2000	PAIA requests, decisions and annual reports

6. Subjects and categories of records held (section 51(1)(b)(iv))

The School holds records in the subjects and categories below, on paper and electronically. Listing a category does not mean access will be granted.

Subject	Categories of records
Governance and statutory	Memorandum of Incorporation; CIPC and NPO records; board minutes and resolutions; registration with the Gauteng Department of Education; IEB affiliation records
Learners — admissions	Application forms; birth certificates or identity documents; previous school reports; transfer cards; study permits where applicable
Learners — academic	Class lists; assessment and examination records; reports; IEB registration and results; learning support records
Learners — welfare and discipline	Medical and emergency information; incident reports; disciplinary records; counselling referrals; attendance

Subject	Categories of records
	registers
Parents	Contact details; parent contracts; fee accounts and payment history; correspondence
Staff	Personnel files; employment contracts; qualifications and SACE registration; payroll and tax records; leave; performance and disciplinary records; background checks
Finance	Annual financial statements; accounting records; bank records; budgets; audit reports; debtor and creditor records
Operations and facilities	Supplier contracts; asset registers; insurance policies; health and safety records; CCTV footage; transport and excursion records
Information technology	IT policies; system access logs; school administration system (Ed-Admin) records; learning management system (Moodle) records; email and cloud storage records
Communications	Newsletters; circulars; website and social media content; WhatsApp parent group communications
Legal	Contracts; litigation and dispute files; legal opinions; insurance claims
PAIA and POPIA	Requests, decisions, objections, consents and security compromise records

7. How to request access to a record

Under section 50 of PAIA, a requester must be given access to a record of the School if the record is needed to exercise or protect a right, the procedural requirements are met, and no ground of refusal applies.

7.1 Request procedure

1. Complete **Form 2** (Request for Access to Record), prescribed by regulation 7 of the PAIA Regulations, 2021. It is available from the Regulator or the school office.
2. Give enough detail for the record to be identified, state the form of access required, and identify the right you seek to exercise or protect and why the record is needed.
3. If requesting on behalf of someone else, attach proof of your authority to do so.
4. Submit the form to the Information Officer by hand, post or email (section 2).

5. Pay the request fee when notified. A personal requester asking for their own personal information does not pay a request fee.
6. The Information Officer will decide within **30 days** of receiving a complete request, and notify the requester in writing.
7. The 30 days may be extended once, by up to 30 more days, where the request covers many records, needs a search of records held elsewhere, or requires consultation. The requester will be told why.
8. If access is granted, the requester pays any access fee and deposit before the record is released.

If no decision is received within the period, the request is deemed refused (section 58).

If a request involves a third party's information, the School will notify that third party within 21 days and consider any representations before deciding (section 71).

7.2 Requests by learners and parents

A parent or guardian may request a learner's personal information on the learner's behalf. A learner's own information is generally dealt with under POPIA (section 23), which uses the same process. The School may verify identity before releasing any personal information.

7.3 Grounds for refusal

Chapter 4 of Part 3 of PAIA (sections 62 to 70) sets out the grounds on which the School must or may refuse access, including:

- protecting the privacy of a third party who is a natural person, including learners and staff (section 63);
- protecting a third party's commercial information (section 64);
- protecting confidential information of third parties (section 65);
- protecting the safety of individuals and property (section 66);
- records privileged from production in legal proceedings (section 67);
- the School's own commercial information (section 68);
- research information of the School or a third party (section 69).

Requests that are manifestly frivolous or vexatious, or that would unreasonably divert resources, may also be refused. Where only part of a record is protected, the rest may be released (section 59).

7.4 Remedies

There is no internal appeal against a decision of a private body. A requester or third party who is unhappy with a decision may, within **180 days** of being notified:

- lodge a complaint with the Regulator (section 77A); or
- apply to court for relief (section 78), after first exhausting the complaint procedure where PAIA requires it.

8. Fees

The School charges the fees prescribed for private bodies in Annexure B of the PAIA Regulations, 2021 (Regulator fee structure). The full schedule is in Annexure B of this manual.

- **Request fee:** R140.00, payable before the request is processed. Not payable by a personal requester seeking their own personal information.
- **Access fee:** payable if access is granted, covering reproduction, search and preparation, and postage.
- **Deposit:** if search and preparation will take more than 6 hours, the requester may be asked for a deposit of one-third of the access fee.
- Records are withheld until all fees due have been paid.
- A requester may apply to court against payment of the request fee or deposit.

There is no fee exemption for requests to private bodies. The School is not a VAT vendor, so no VAT is added to the prescribed fees.

9. Processing of personal information (section 51(1)(c))

The School processes personal information lawfully, minimally and only for the purposes below, as POPIA requires. Learners' information is the personal information of children and receives special protection under sections 34 and 35 of POPIA.

9.1 Purposes of processing

- admitting, enrolling and educating learners, including assessment, reporting and IEB examination registration;
- caring for learners' safety, health and wellbeing, including emergencies, excursions and transport;
- communicating with parents, learners and staff;
- administering school fees, debtors and financial accounts;
- recruiting, employing and managing staff, including statutory background checks;
- complying with laws and regulators, including the Gauteng Department of Education, SARS, the Department of Employment and Labour and the IEB;
- managing suppliers, facilities, security and IT systems, including CCTV monitoring of the campus to protect learners, staff, visitors and property;
- maintaining alumni relations and fundraising for the School;
- defending or pursuing legal claims.

9.2 Categories of data subjects and their information

Data subject	Personal information processed
Learners (prospective, current and former)	Names; identity or birth details; nationality and study permits; contact and home details; academic records; health, allergy and medical aid details; learning support and psychological reports; disciplinary records; photographs and

Data subject	Personal information processed
	video
Parents and guardians	Names; identity numbers; contact details; employment; banking and account details; fee history; correspondence
Staff and job applicants	Names; identity numbers; contact details; qualifications; SACE registration; employment history; remuneration, tax and banking details; health and leave records; criminal and child-protection checks; performance and disciplinary records
Directors	Names; identity numbers; contact details; statutory records
Suppliers and service providers	Company and contact details; banking details; B-BBEE and tax records; contracts
Visitors and the public	Names; contact details; access-control records; CCTV footage

9.3 Recipients of personal information

Recipient	Purpose
Gauteng Department of Education and Department of Basic Education	Registration, learner data and statutory returns
Independent Examinations Board (IEB)	Examination registration, results and moderation
SARS, UIF, Department of Employment and Labour, CIPC, NPO Directorate	Statutory reporting
Auditors, attorneys and insurers	Audit, legal advice and claims
Banks, payment providers and debt collectors	Fee collection and payments
Medical practitioners and emergency services	Learner and staff health and safety
IT and cloud service providers: Ed-Admin (school administration, hosted on Amazon Web Services), Xneelo (website and Moodle hosting) and Google (Workspace email and document storage)	Hosting and processing data on the School's behalf
Transport and excursion providers	Learner travel and activities

Recipient	Purpose
Other schools	Learner transfers
Law enforcement and courts	Where required by law

Operators who process personal information for the School are bound by written agreements requiring confidentiality and security (sections 20 and 21 of POPIA).

9.4 Transborder flows of personal information

Most of the School's electronic records are hosted in South Africa:

Service	Provider	Server location
Ed-Admin school administration system	Amazon Web Services	Cape Town, South Africa
School website and Moodle site	Xneelo	Johannesburg, South Africa
Google Workspace (email, documents, storage)	Google	Google data centres, which may be outside South Africa

Personal information held in Google Workspace may therefore be transferred outside South Africa. Such transfers take place only as section 72 of POPIA allows: Google is bound by data-processing terms and by laws that give an adequate level of protection.

9.5 Information security measures

The School applies reasonable technical and organisational measures to protect personal information, including:

- access controls, unique user accounts and passwords on school systems;
- role-based access, so staff see only the information they need;
- firewalls, antivirus software and regular software updates;
- regular backups of electronic records;
- locked storage for paper learner and staff files;
- confidentiality clauses in staff and operator contracts;
- staff awareness of POPIA obligations;
- a procedure for reporting and handling security compromises to the Regulator and affected data subjects (section 22).

9.6 Retention of personal information

The School keeps personal information only for as long as it is needed for the purpose it was collected, or for as long as the law requires, as section 14 of POPIA allows. Retention periods for each category of record are set out in the School's records retention schedule, which forms part of its POPIA Policy and is available from the Information Officer on request.

In general, once a learner leaves the School:

- a core academic record (name, dates of attendance and results) is kept so that the School can confirm attendance and issue reports to former learners;
- records needed for legal, tax or audit purposes, or for a possible claim, are kept for the period those laws require;
- the rest of the learner's file is securely destroyed or de-identified at the end of its retention period.

9.7 Data subject rights

Data subjects may ask the School to confirm, access, correct or delete their personal information, and may object to its processing. Use the Regulator's prescribed POPIA forms (Form 1 for objections; Form 2 for correction or deletion) and send them to the Information Officer. Complaints may be lodged with the Regulator at POPIAComplaints@inforegulator.org.za.

10. Availability and updating of this manual (section 51(3))

This manual is available:

- on the School's website, www.randschools.co.za;
- at the school office, 74 Sixth Avenue, Bezuidenhout Valley, for inspection during office hours;
- to any person on request, on payment of a reasonable copying fee;
- to the Regulator on request.

The School will review this manual at least once a year and update it whenever its records, contact details or processing of personal information change.

Approval

Issued by the head of Rand Preparatory and College NPC.

Signed electronically by:

Mr B A Harris Executive Headmaster and CEO / Information Officer

Date: 28 October 2026

Annexure A: Request form (Form 2)

Requests must be made on the current prescribed Form 2 under regulation 7 of the PAIA Regulations, 2021. The repealed "Form A" is no longer accepted. Download it from the Regulator or collect it from the school office.

Form 2 asks for:

1. Particulars of the requester (and of the person on whose behalf the request is made, if any).
2. Particulars of the record requested, described in enough detail to identify it.
3. The form of access required (copy, inspection, electronic copy, transcription).
4. The right the requester seeks to exercise or protect, and why the record is needed.
5. The preferred method of notification of the outcome.
6. The requester's signature and date.

Annexure B: Fees payable to the School

Item	Description	Amount
1	Request fee, payable by every requester (except a personal requester)	R140.00
2	Photocopy or printed black-and-white copy, per A4 page	R2.00 per page or part
3	Printed copy of A4-size page	R2.00 per page or part
4	Copy in computer-readable form: flash drive provided by requester / CD provided by requester / CD provided by School	R40.00 / R40.00 / R60.00
5	Transcription of visual images, per A4 page	Outsourced; per service provider's quotation
6	Copy of visual images	Outsourced; per service provider's quotation
7	Transcription of an audio record, per A4 page	R24.00
8	Copy of an audio record: flash drive provided by requester / CD provided by requester / CD provided by School	R40.00 / R40.00 / R60.00
9	Search and preparation, per hour or part (excluding the first hour)	R145.00, capped at R435.00
10	Deposit, if search exceeds 6 hours	One-third of the amount calculated under items 2 to 8
11	Postage, email or other electronic transfer	Actual expense, if any

Fees as published by the Regulator (fee structure, checked 27 October 2026).

Sources

- Information Regulator: PAIA fees structure
- Information Regulator: PAIA resources
- Information Regulator: Form 2
- SAICA: all private bodies must prepare a PAIA manual